DOCUMENT RESUME

ED 304 355 SO 019 604

AUTHOR	Duffus, James, III; And Others
TITLE	Cultural Resources: Implementation of Federal Historic Preservation Program Can Be Improved. Report to Congressional Requesters.
INSTITUTION	General Accounting Office, Washington, DC. Resources, Community, and Economic Development Div.
REPORT NO	GAO/RCED-88-81
PUB DATE	Jun 88
NOTE	83p.
AVAILABLE FROM	U.S. General Accounting Office, Post Office Box 6015, Gaithersburg, MD 20877 (first five copies are free; additional copies are $2.00 each).
PUB TYPE	Reports - General (140)
EDRS PRICE	MF01/PC04 Plus Postage.
DESCRIPTORS	*Federal Regulation; *Preservation; *Program Evaluation; Public Agencies; Summative Evaluation; United States History
IDENTIFIERS	Historical Landmarks; Historic Sites; *National Historic Preservation Act 1966

ABSTRACT

This report summarizes the General Accounting Office's (GAO) review of six federal agencies' compliance with the National Historic Preservation Act of 1966 and its 1980 amendments. The six agencies have not fully complied with their responsibilities and, as a result, federally owned or managed historic properties have been damaged or allowed to significantly deteriorate. Specifically, the report states that the Secretary of the Interior has not established an adequate preservation training program for the department and that the six agencies have not been adequately protecting, preserving, and maintaining some of their properties. These agencies believe that they need better guidance from the Secretary of the Interior's office and more specific program funding. The GAO recommendations include: (1) ensuring that historic properties be given preference over nonhistoric properties; (2) establishing agency-wide time frames to locate, inventory, and nominate historic properties; and (3) emphasizing that properties must be adequately protected, preserved, and maintained. Appendices contain: (1) Section 110 of the amended National Historic Preservation Act of 1966; (2) a list of the reviewed sites; (3) a list of service awards; and (4) response comments to the GAO's evaluation. Four black and white photographs are included. (DJC)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

SD

United States General Accounting Office

GAO

Report to Congressional Requesters

June 1988

ED3043555

CULTURAL RESOURCES

Implementation of Federal Historic Preservation Program Can Be Improved

U.S. DEPARTMENT OF EDUCATION
Office of Educational Research and Improvement
EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)

X This document has been reproduced as received from the person or organization originating it.

☐ Minor changes have been made to improve reproduction quality.

• Points of view or opinions stated in this document do not necessarily represent official OERI position or policy.

30 019 604

GAO/RCED-88-81

GAO

United States
General Accounting Office
Washington, D.C. 20548

Resources, Community, and
Economic Development Division

B-125045

June 9, 1988

The Honorable Morris K. Udall
Chairman, Committee on Interior
and Insular Affairs

The Honorable Bruce F. Vento
Chairman, Subcommittee on
National Parks and Public Lands
Committee on Interior and Insular
Affairs
House of Representatives

This report responds to your joint July 29, 1986, letter which asked us to review the historic buildings management programs of six federal agencies: the Department of Agriculture's Forest Service, the Department of the Interior's Bureau of Land Management and National Park Service, the General Services Administration, the Postal Service, and the Veterans Administration. We later agreed with your office to limit our review to the agencies' compliance with the historic preservation responsibilities and duties set forth primarily in section 110 of the National Historic Preservation Act of 1966, as amended.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of this letter. At that time, we will send copies to the Secretaries of Agriculture and the Interior; the Director, Bureau of Land Management; the Chief, Forest Service; the Director, National Park Service; the Administrator of General Services; the Postmaster General; the Administrator of Veterans Affairs; the Director, Office of Management and Budget; the Chairman, Advisory Council on Historic Preservation; and the President, National Trust for Historic Preservation. We will also make copies available to others upon request.

This work was performed under the direction of James Duffus III, Associate Director. Other major contributors are listed in appendix XI.

J. Dexter Peach

J. Dexter Peach
Assistant Comptroller General

Executive Summary

Purpose

One of the major purposes of the National Historic Preservation Act of 1966, as amended in 1980, was to expand the federal government's recognition of and responsibility to protect its own historic properties. However, 1986 congressional hearings revealed many problems regarding federal agencies' implementation of the legislation.

Because of these problems, the Chairmen of the House Committee on Interior and Insular Affairs, and its Subcommittee on National Parks and Public Lands requested that GAO review federal agency compliance with historic preservation requirements. GAO's review focused on the following issues:

- Have the Secretary of the Interior and the federal agencies complied with their historic preservation responsibilities and duties as required by section 110 and related sections of the amended act?
- If the Secretary and the federal agencies have not complied with these responsibilities, what are the consequences?
- What is needed to bring the Secretary and the federal agencies into compliance?

Background

The 1966 act was passed, in part, because the Congress recognized that federal projects, such as highways, dams, and urban renewal, had damaged or destroyed thousands of historic properties during the 1950s and 1960s. The act required federal agencies to, among other things, take into account the effect of any federal undertaking upon historic properties included in a national register of historic sites, buildings, structures, and objects. In 1980, Congress amended the act, principally under section 110, to require agencies to establish historic preservation programs, nominate their historic properties to the National Register of Historic Places (properties must be at least 50 years old or have achieved significance of exceptional importance within the past 50 years), and maximize the use of their historic properties. The amended act also imposed specific responsibilities on the Secretary of the Interior. These provisions require the Secretary to support and guide the federal agencies' historic preservation programs by guidelines, training programs, an awards program, and various other activities.

GAO reviewed the status of historic preservation programs at six federal agencies: the Department of Agriculture's Forest Service, the Department of the Interior's Bureau of Land Management and National Park Service, the General Services Administration, the Postal Service, and the

Veterans Administration. Visits were made to the agencies' headquarters and the 25 field office locations where historic properties are most heavily concentrated.

Results in Brief

The Secretary of the Interior and the six agencies have not fully complied with their historic preservation responsibilities. As a result of inadequate compliance, federally owned or managed historic properties have been damaged or allowed to significantly deteriorate. In some cases, the lack of historic preservation efforts is a result of factors beyond the control of the agencies. Nevertheless, several recommended corrective actions can improve the agencies' compliance with the requirements of the amended act.

Principal Findings

Interior Secretary's Responsibilities

The Secretary has not established an adequate governmentwide preservation training program for preservation-related staff. Although the Secretary has stated that he has complied with the historic preservation awards requirements, it does not appear that any of the implemented awards cited by the Secretary meets the awards requirements of the amended act. It remains to be seen whether two new awards, cosponsored by the Secretary, will satisfy the awards criteria. The Secretary has only recently issued compliance guidelines to federal agencies. As a result, federal agencies have not had the full guidance and support in establishing and maintaining their historic preservation programs intended by the Congress. The Park Service's Associate Director for Cultural Resources pointed out that the Secretary's external historic preservation responsibilities were sizable and complex and available resources were not adequate to fulfill all of his program responsibilities, which slowed compliance with the 1966 amended act's requirements.

Agency Responsibilities

Because of their different sizes and missions and other agency priorities, the six agencies that GAO reviewed have had mixed results in locating, inventorying, and nominating their historic properties and may not have maximized the use of their historic buildings. In addition, the six agencies have not been adequately protecting, preserving, and maintaining some of their historic properties. This has resulted in deterioration or

damage of historic properties, including those of national and international significance. For example, the San Juan National Historic Site was severely damaged as a result of improper Park Service maintenance.

Agency officials generally agreed that their agencies' compliance with the historic preservation requirements of the amended act could be improved. However, they also believe that they need better guidance and support from Interior and specific program funding.

Recommendations

GAO recommends that the Secretary of the Interior direct the Park Service Director to

- develop and provide, as part of the Park Service's fiscal year 1990 budget request, a proposal to the Congress detailing how the Park Service intends to comply with the training requirements of the national historic preservation act, as amended. The proposal should include implementation time frames and other pertinent information.

GAO also makes recommendations to the Secretaries of Agriculture and the Interior, the Administrators of General Services and the Veterans Administration, and the Postmaster General regarding the preferred use of historic buildings; and the establishment of agencywide efforts to locate, inventory, nominate, protect, preserve, and maintain their historic properties. (See p. 36.)

Agency Comments

Agriculture's Forest Service agreed with GAO's recommendations and noted that the report identified important concerns with the preservation of the historic remains of the nation's heritage. (See app. IV.)

Interior's National Park Service disagreed with several of the report's findings and conclusions. The Park Service said that the training opportunities that are listed in the report are not complete. However, it agreed that more could be done in providing preservation training and that this issue would be considered while it prepares its 1990 budget. In its discussion of the Park Service's training activities, GAO has noted that the list is not complete, but is intended to illustrate the variety of training available. The Park Service also said it would consider the possibility of serving as a clearinghouse for available preservation training for federal agencies, but noted that agencies need to take advantage of training sponsored by others as well as the Park Service. (See app. V.)

The Advisory Council on Historic Preservation said that the report's conclusions are consistent with its own observations and concurred in most of the report's recommendations. It questioned the wisdom of requiring agencies to locate, inventory, and nominate historic properties within specific time frames. However, GAO found that 8 years after being so directed, agencies have made only limited progress in these areas. GAO believes, therefore, that requiring agencies to establish time frames, which are now absent, will promote preservation compliance efforts by creating a specific performance period in which agency actions are to be accomplished. (See app. IX.)

The National Trust for Historic Preservation agreed with the report's findings and recommendations. The Veterans Administration agreed with GAO's findings and concurred, in part, with the report's recommendations. The Postal Service noted that it has already taken several actions along the lines of those recommended in the report. The General Services Administration cited no significant problems with the report. (See apps. VI, VII, VIII, and X.)

Contents

Executive Summary		2
Chapter 1 Introduction		8
	Federal Role in National Historic Preservation Program	9
	Objectives, Scope, and Methodology	10
Chapter 2 Historic Preservation Requirements Have Not Been Fully Implemented by the Interior Secretary		15
	Issuance of Historic Preservation Guidelines Has Not Been Timely	15
	Historic Preservation Training Programs Are Not Adequate	18
	Establishment of an Awards Program Is Still Uncertain	22
	Conclusions	24
	Recommendation	24
	Agency Comments and Our Evaluation	25
Chapter 3 Limited Progress Made by Federal Agencies in Implementing Historic Preservation Requirements		26
	Use of Historic Properties Not Maximized	26
	Agencies' Efforts to Locate, Inventory, and Nominate Their Historic Properties Have Been Mixed	27
	Agencies' Efforts to Protect, Preserve, and Maintain Their Historic Properties Have Been Inconsistent	29
	Conclusions	36
	Recommendations	36
	Agency Comments and Our Evaluation	37
Appendixes		
	Appendix I: Section 110 Of the National Historic Preservation Act of 1966, as Amended	42
	Appendix II: List of 25 Federal and 6 SHPOs Locations GAO Selected for Review	44
	Appendix III: Existing Awards of the Interior Department, Park Service, and Other Organizations	45
	Appendix IV: Comments From the Department of Agriculture	48
	Appendix V: Comments From the Department of the Interior	51
	Appendix VI: Comments From the General Services Administration	57
	Appendix VII: Comments From the U.S. Postal Service	61

Appendix VIII: Commments From the Veterans Administration 64
Appendix IX: Comments From the Advisory Council on Historic Preservation 67
Appendix X: Comments From the National Trust for Historic Preservation 74
Appendix XI: Major Contributors to This Report 78

Figures

Figure 3.1: Tallac National Historic Site, Lake Tahoe, California 31
Figure 3.2: Whiskey Creek Trestle Historic Site, Rio Blanco County, Colorado 33
Figure 3.3: Lowry Pueblo Ruins Historic Site, Pleasant View, Colorado 34
Figure 3.4: Walls of the Lowry Pueblo Ruins Are Deteriorating 34

Abbreviations

ACHP	Advisory Council on Historic Preservation
BLM	Bureau of Land Management
CRM	Cultural Resource Management
DOE	Determination of Eligibility
DOI	Department of the Interior
FS	Forest Service
FY	fiscal year
GAO	General Accounting Office
GSA	General Services Administration
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NPS	National Park Service
SHPO	State Historic Preservation Officer
VA	Veterans Administration

Introduction

In 1966, the Congress recognized the growing importance of the nation's cultural heritage by passing the National Historic Preservation Act of 1966,[1] a law intended to preserve and protect historic properties. The Congress amended the 1966 act in 1980.[2] The 1980 amendments (much of its language was derived directly from Executive Order 11593, issued in 1971) directed federal agencies to establish historic preservation programs and prescribed how federal agencies should identify, evaluate, register, and protect their historic properties.

The impetus for the 1966 act began during the 1950s and 1960s, when federal historic preservation laws applied to a limited number of nationally significant historic properties. During those decades, hundreds of needed federal projects, such as highways, dams, and urban renewal, were completed with little regard for the national, state, and local significance of historic properties. As a result, these federal projects destroyed or damaged thousands of historic properties. The Congress recognized that new legislation was needed to ensure that federal agencies considered historic properties in their planning. The National Historic Preservation Act of 1966 was passed to address these concerns and is the cornerstone of federal preservation law.

Within the federal government, agencies' historic preservation duties and responsibilities, other than from section 106, are set forth primarily in section 110 of the amended act.[3] In brief, section 110 requires federal agencies to locate, inventory, and nominate their properties that appear to qualify for inclusion in the National Register of Historic Places (National Register),[4] and to administer their programs and projects in accordance with the purposes of the amended act. Historic properties must be at least 50 years old or have achieved significance of exceptional importance within the past 50 years. The agencies are encouraged to maximize their use of these properties.

[1]Approved October 15, 1966 (P.L. 89-665; 80 Stat. 915; 16 U.S.C. 470).

[2]Amended December 12, 1980 (P.L. 96-515).

[3]Section 106 requires federal agencies to consider the effects of undertakings on properties listed in or eligible for the National Register of Historic Places and provide the Advisory Council on Historic Preservation an opportunity to comment with regard to such undertakings.

[4]The National Register is the official list of the nation's cultural resources worthy of preservation. It is authorized under section 101 of the amended act, and administered by the National Park Service under the Secretary of the Interior.

Although the amended act requires federal agencies to establish and maintain intensive preservation programs, the Congress has not provided and the agencies have not requested specific funding for the agencies' section 110 historic preservation activities. In addition, the amended act did not establish specific time frames for agency compliance under section 110.

Federal Role in National Historic Preservation Program

The amended act expanded the federal government's responsibility to protect historic properties of state, local, and national significance. Under the act, federal agencies are directed to carry out their missions, programs, and projects in a manner consistent with the requirements and purposes of section 110, existing regulations, and guidelines developed by the Secretary of the Interior. The national historic preservation program has operated as a working partnership between federal, state, and local governments, and private citizens. Other partners include the Advisory Council on Historic Preservation (ACHP) and the National Trust for Historic Preservation (National Trust).

In general, the federal government provides guidelines, technical assistance, and grants-in-aid for state and local historic preservation efforts, and monitors its own activities so that they do not unnecessarily harm historic properties. State historic preservation officers (SHPOs) coordinate the national program at the state level, assist local governments and the interested public and give them advice on preservation matters, and carry out other aspects of the national program on behalf of the federal government.[5] Preservation work at historic sites takes place primarily at the local level through local governments, nonprofit organizations and institutions, corporations, and interested individuals.

The ACHP is composed of federal agency heads whose departmental actions regularly affect historic properties; historic preservation experts, a governor, a mayor, and private citizens appointed by the President; and representatives of the National Trust and the Conference of State Historic Preservation Officers. It was established by the act to advise the President, federal agencies, and the Congress on matters relating to historic preservation, and to recommend measures for coordinating the preservation activities of federal, state, and local agencies and private institutions. It also reviews federal agencies' policies and

[5]According to section 101(b)(1)(A) of the amended act, a governor is empowered to designate and appoint a "State Historic Preservation Officer" to administer the historic preservation program at the state level.

programs and writes and distributes general historic preservation information. When a federal undertaking would affect an historic property, the ACHP must be afforded a reasonable opportunity to comment on it.

The National Trust, although chartered and partially funded by the Congress, is a private nonprofit membership organization that was established by congressional charter in 1949 to enhance public participation in historic preservation.[6] For example, the National Trust organized the parade of tall ships at the July 4, 1986, Statue of Liberty celebration, which focused the nation's attention on its historic maritime heritage. The National Trust is an advocate on behalf of historic preservation at the local, state, and national levels. The National Trust has also been cited as a source of information and expertise regarding historic preservation technologies.

All of the partners have significant roles and responsibilities within the national historic preservation program. However, the amended act provided specific leadership responsibilities to the federal government. For example, the Secretary of the Interior is empowered to promulgate the standards and guidelines by which federal agencies and state and local governments determine which properties are historic and what level of federal investment should be made. The Secretary stands at the center of the program and is responsible for ensuring, through standards and guidelines, that the various program elements are balanced and that national preservation objectives are understandable to the public and are based upon common needs and common sense.

In addition to the Secretary's responsibilities, every federal agency has certain responsibilities for the historic properties under its control.[7] These responsibilities are set forth primarily in section 110 of the amended act. (See app. I.)

Objectives, Scope, and Methodology

To determine the status of historic preservation compliance by federal agencies, the Public Lands (now National Parks and Public Lands) Subcommittee, House Committee on Interior and Insular Affairs, conducted a series of oversight hearings in early 1986. According to the Committee and Subcommittee Chairmen, these hearings indicated that many problems exist regarding the implementation of federal agencies' historic

[6]P.L. 81-408; 63 Stat. 927.

[7]Section 110(a)(1) of the amended act directs all federal agencies to assume responsibility for the preservation of historic properties which they own or control.

preservation programs. Consequently, on July 29, 1986, the Chairmen jointly requested that we identify and determine the possible scope of these and related problems at six federal agencies—the Department of Agriculture's Forest Service, the Department of the Interior's Bureau of Land Management (BLM) and National Park Service (Park Service), the General Services Administration (GSA), the U.S. Postal Service (Postal Service),[8] and the Veterans Administration (VA).

As subsequently agreed with the Chairmen's offices, this report addresses the following issues:

1.Have the Secretary of the Interior and the federal agencies complied with their historic preservation responsibilities and duties as required by section 110 and related sections of the amended act? (See chs. 2 and 3.)

2.If the Secretary and the federal agencies have not complied with their section 110 and related historic preservation duties and responsibilities, what are the results of inadequate compliance? (See chs. 2 and 3.)

3.What corrective actions are needed to bring the Secretary and the federal agencies into compliance with section 110 and related sections? (See chs. 2 and 3.)

We also agreed to separately discuss the Secretary of the Interior's responsibilities under section 110 as they relate to the agencies' efforts to implement their section 110 activities.

To address the first issue, we obtained information from the six agencies' headquarters offices in Washington, D.C., regarding specific actions taken to implement section 110 of the act, such as developing historic preservation policies, procedures, regulations, and guidance; allocating resources; and providing personnel training.

We analyzed those portions of section 101 (which authorizes the maintenance of the National Register; the development of SHPO regulations; and grants to states, among other activities) and section 110 that spell out the duties and responsibilities of the Secretary of the Interior. The amended act makes the Secretary responsible for promulgating historic

[8]The Postal Reorganization Act of 1970 established the U.S. Postal Service as an independent self-sustaining part of the executive branch of the government.

preservation standards and guidelines for the agencies to follow. Furthermore, the Secretary is responsible for developing a training program for federal agencies' historic preservation officers.

We also gathered information regarding the agencies' actions to implement section 110 requirements in their field operations. As agreed with the requesters' offices, we visited a total of 25 federal agency field office locations, primarily in the eastern and western states, where the six agencies' historic buildings are heavily concentrated. Our selection of the offices was discussed with agency officials, who agreed that the activities in these offices would be fairly representative of their overall efforts to implement section 110. Our objective at the 25 federal agency field offices was to determine the operational status of historic preservation activities required under section 110, including

- identification of historic properties,
- documentation and nomination of historic properties for inclusion in the National Register, and
- use of historic properties.

We reviewed the historic preservation documentation at the 25 federal agency field offices to determine if Secretary of the Interior approvals of transfers of surplus federally owned historic properties had been obtained in compliance with section 110(e) requirements.

We gathered information on seven deteriorating federal properties, including the (1) U.S. Naval Home (GSA/Navy), Philadelphia, Pennsylvania, (2) Gettysburg battlefield (Park Service), Gettysburg, Pennsylvania, (3) Ashcroft mining town (Forest Service), Aspen Colorado, (4) Lowry ruins (BLM), Pleasantview, Colorado, (5) Eldorado National Forest (Forest Service), Lake Tahoe, California, (6) Whiskey Creek Trestle (BLM), Rio Blanco County, Colorado, and (7) Allegheny National Forest (Forest Service), Warren, Pennsylvania.

In addition, we contacted or visited six selected SHPOs to obtain their perspectives on the historic preservation implementation performance of the six federal agencies. The states in which the SHPOs are located were selected because of (1) their large numbers of historic structures listed on the National Register and (2) their close proximity to the federal agency field offices we visited. (App. II shows the 25 federal agency and 6 SHPO locations we visited or contacted.) We also supplemented the information obtained from our visits to the federal and state headquarters/field offices with information obtained from 49 federal agencies,

including the 6 agencies we reviewed. We gathered this information from a questionnaire sent out in 1985 by the National Parks and Public Lands Subcommittee, House Committee on Interior and Insular Affairs. The questionnaire consisted of 12 sets of questions which called upon agencies to provide narrative descriptions of their historic preservation activities or their views on particular subjects, including balancing historic preservation requirements on the one hand and achieving the agencies' missions on the other. After the questionnaire results were received by the Subcommittee, the Chairman asked us to summarize the results, which we did in our December 1985 fact sheet to the Chairman of the Subcommittee, entitled Cultural Resources: Results of Questionnaire on Federal Agency Historic Preservation Activities (GAO/RCED-86-45FS).

To address the second issue, we discussed with federal and state officials the historic preservation program weaknesses and noncompliance matters that were identified during our review work. We primarily relied on federal and state officials to identify, as examples, specific historic properties which best demonstrated the serious adverse effects of noncompliance with historic preservation requirements. We discussed the cause and effect relationships of the identified adverse conditions with each agency's historic preservation officer and field preservation staff.[9]

To address the third issue, we discussed the specific problems and obstacles in establishing and complying with the requirements of section 110 with officials of the six federal agencies' headquarters and field offices responsible for implementing historic preservation programs. We also analyzed, interpreted, and compared the information gathered in response to the first and second issues.

Additional information regarding possible corrective actions, provided by recent studies issued by the Office of Technology Assessment and the ACHP, was also incorporated in our assessment as appropriate.[10]

[9]Each federal agency, unless exempted under section 214, is required under section 110(c) of the amended act to designate a "preservation officer," who is responsible for coordinating that agency's historic preservation activities. None of the six agencies included in our review were exempted under section 214.

[10]See Technologies for Prehistoric and Historic Preservation, Office of Technology Assessment, Sept. 1986; and The National Historic Preservation Act of 1966: An Assessment of Its Implementation Over Twenty Years, Advisory Council on Historic Preservation, Sept. 1986.

We also evaluated selected internal controls used by agency program managers to carry out their section 110 historic preservation duties and responsibilities.

Our review was performed between January and October 1987 and was conducted in accordance with generally accepted government auditing standards.

We discuss the Secretary of the Interior's compliance with the mandates of sections 101 and 110 in chapter 2. Chapter 3 discusses the status of the six agencies' efforts to fulfill their historic preservation responsibilities as outlined in section 110.

Historic Preservation Requirements Have Not Been Fully Implemented by the Interior Secretary

The amended act imposed specific responsibilities on the Secretary of the Interior for administering and implementing the national historic preservation program. For example, section 101(a)(1)(A) of the act authorizes the Secretary to maintain the National Register and section 110(e) directs the Secretary to review and approve the plans of transferees of surplus federally owned historic properties. Because of these responsibilities, the Secretary occupies a unique position within the program. These responsibilities have been delegated to the Park Service.

The Park Service has only partially implemented the statutory responsibilities assigned to the Secretary under the amended act. The Park Service has not established an adequate governmentwide training program for federal agencies' preservation-related staff and others as required by section 101(h). The Park Service has also not established an historic preservation awards program as required by section 110(h). Although the Secretary recently helped establish two historic preservation awards, it is uncertain whether either of the awards will comply with the requirements of the amended act. The Park Service has only recently issued historic preservation compliance guidelines detailing federal agencies' section 110 responsibilities as required by section 110(c).

As a result, (1) preservation-related and other agency personnel have not received adequate historic preservation training, which in some cases has resulted in significant damage to historic resources, (2) federal agency personnel have not received the level of recognition for their historic preservation achievements that the amended act intended, and (3) federal agency personnel may have been uncertain of their section 110 responsibilities, and their understanding of the law varies from agency to agency.

Issuance of Historic Preservation Guidelines Has Not Been Timely

Section 101(f) of the amended act requires the Secretary of the Interior to promulgate historic preservation compliance guidelines detailing federal agencies' responsibilities under section 110. As stated earlier, the Secretary delegated this authority to the Park Service, which issued the guidelines on February 17, 1988.

Purpose of the Requirement

Section 110 prescribes general and specific responsibilities for federal agencies to follow to preserve historic structures. The Congress, in passing the 1966 act, envisioned that the listing of properties in the National

Register and subsequent planning for and treatment of historic properties would be done in accordance with uniform national standards.

According to The Secretary's 20th Anniversary Report on the National Historic Preservation Act,[1] guidelines mandated by section 101(f) would present a model and reference standard for federal agencies to use when establishing, revising, and operating programs for historic resource management. The guidelines would assist agencies by establishing a framework to ensure that their missions, programs, and projects are consistent with the purposes of the national historic preservation program as set forth in the amended act. As such, the Secretary's guidelines would serve as the "federal handbook" on historic preservation.

Issuance of the Guidelines Was Delayed for Several Reasons

The 1980 amendments added section 101(f), which required the Park Service to develop and issue compliance guidelines for federal agency responsibilities under section 110 of the amended act. According to the Associate Director for Cultural Resources, the Park Service was not timely in issuing the section 110 guidelines for several reasons. For example, subsequent changes in historic preservation tax provisions, administered in part by the Park Service, created a drain on the Park Service's resources, which slowed the development and issuance of the section 110 guidelines.[2]

On March 10, 1986, the Park Service proposed the Guidelines for Historic and Archeological Resource Management: Federal Agency Responsibilities Under Section 110 of the National Historic Preservation Act in compliance with section 101(f) of the amended act. After making extensive revisions to the section 110 guidelines, the Park Service subsequently issued the guidelines, which became effective on February 17, 1988.

[1]U.S. Government Printing Office, 1986.

[2]The Park Service was required, along with the Internal Revenue Service, to administer the historic preservation tax provisions authorized by the Economic Recovery Tax Act (P.L. 97-34, Aug. 13, 1981). Among other things, the 1981 act repealed prior tax code amortization provisions for rehabilitation of historic properties and, instead, allowed a tax credit of 25 percent of the qualified rehabilitation expenditures incurred. The Tax Reform Act of 1986 reduced the credit to 20 percent. The Park Service was responsible for determining whether (1) properties are historically significant and (2) proposed or completed rehabilitation work conforms to the Secretary of the Interior's "Standards for Rehabilitation."

Results of Delayed Compliance

The Park Service's delay in issuing the section 110 guidelines may at least be partially responsible for the variability and uncertainty among the six federal agencies in implementing their historic preservation programs. The following is an illustration.

Section 110(a)(1) states, in part, that

"Prior to acquiring, constructing, or leasing buildings for purposes of carrying out agency responsibilities, each Federal agency shall use, to the maximum extent feasible, historic properties available to the agency."

The agencies we reviewed have been implementing this section in various ways. For example, GSA uniformly requires each of its regional offices to maintain a list containing all historic properties suitable for office space or other commercial use. All leasing requirements for new space or relocations must be compared with the list to determine whether the requirements can be satisfied on a cost-effective basis by utilizing historic properties.[3]

In contrast, the Postal Service and Forest Service have no specific requirements to use historic properties in preference to new or nonhistoric properties, according to agency officials. These and other examples of variations in agency implementation of the section 110 requirements are discussed in greater detail in chapter 3.

In addition to implementation variations, we also found that agency officials may be uncertain of the extent of their implementation responsibilities because of the delay in issuing the section 110 guidelines. The ACHP's Acting Executive Director and General Counsel told us that because the section 110 guidelines had not been issued, there appeared to be widespread misunderstanding regarding agency actions and compliance responsibilities required by the amended act. For example, the GSA Assistant Regional Administrator in Philadelphia told us that without the specific section 110 guidance, he was not sure if his regional historic preservation program had satisfied Congress' expected level of federal agency commitment and compliance. The Park Service's Mid-Atlantic Acting Associate Director for Cultural Resources and the Acting Division Chief for Planning and Resource Preservation agreed that the section 110 requirements are so broad and vague that without the specific section 110 guidance, they were not sure whether they were meeting the expected level of compliance envisioned by the Congress.

[3]GSA Order "Procedures for Historic Properties" ADM 1020.1, Aug. 20, 1982, p. 12.

Historic Preservation Training Programs Are Not Adequate

Section 110(a)(1) of the amended act places the responsibility for historic preservation efforts with the individual agencies. Under section 110(c), each federal agency must designate a qualified official to serve as its preservation officer and carry out the agency's preservation efforts. The effectiveness of these efforts is largely dependent upon the qualifications and training of the preservation officer and other preservation-related staff.

Purpose of the Section 101(h) Requirement

To provide information concerning professional methods and techniques for the preservation of historic properties and for the administration of the historic preservation program, section 101(h) directs the Secretary of the Interior to make training and information about historic preservation methods, techniques, and administrative procedures available to federal agencies, state and local governments, and the general public.

Park Service's Section 101(h) Training Capability Is Limited

The Park Service has established a cultural resources training program that includes numerous historic preservation courses and publications. However, the Park Service's training capability is limited and may not be adequate to meet the section 101(h) historic preservation training requirement.

Although there are other training programs, the Secretary's 20th anniversary report illustrates the type of training programs the Park Service has established for Park Service personnel and others. It shows that the Park Service has developed and sponsored a wide variety of preservation training courses for federal, state, and local officials as well as the private sector. For example, the Park Service offered 44 servicewide courses conducted at various locations, including the Park Service's Mather and Albright Training Centers in West Virginia and Arizona, respectively; the Federal Law Enforcement Training Center in Georgia; and various Park Service regional offices during fiscal year 1987. Twenty-five percent of the training curriculum—11 courses—was related to preservation issues. In 1981-82, the Park Service cosponsored with the National Trust 12 workshops across the country on preservation tax incentives and rehabilitation issues. The workshops attracted over 3,500 developers, architects, and attorneys; and local, state, and federal officials. Another series of workshops was cosponsored with the Association for Preservation Technology between 1983 and 1985, providing training to 600 architects, contractors, developers, and city officials on appropriate preservation techniques and treatments. The Park

Service has also provided an assortment of technical publications on the preservation and restoration of historic structures.

In comparison with the other five federal agencies included in our review, the Park Service's historic preservation training capabilities seem enormous. However, our review indicates that the Park Service's training program may not be adequate to completely satisfy the section 101(h) requirement or even its own preservation training needs. For example, a total of about 336 participants attended the 11 historic-preservation-related courses cited above. According to the Park Service's former Acting Director, about 943 Park Service employees have direct cultural resources (includes historic and archeological resources) responsibilities in the park system. He stated, however, that Park Service employees at all levels are directly or indirectly involved in the management, interpretation, and protection of park cultural resources. Using these data, we calculated that Park Service employees, who had direct preservation responsibilities, could expect to attend Park Service-related training, on an average rotational basis, only about once every 3 years (943 divided by 336 = 2.8 years). If additional Park Service personnel (the Park Service had about 14,600 full-time positions during fiscal year 1986) or other federal agency personnel attend Park Service preservation courses, this average time would increase proportionately.

Further, Park Service officials also indicated that Park Service employees' actual attendance at preservation-related training is infrequent. The following is an illustration. The Park Service's Southeast Region encompasses 53 parks in 8 states, Puerto Rico, and the Virgin Islands. Of these, about 35 parks have historically significant resources, including cabins, forts, and lighthouses. The remaining 18 parks also have historic properties of less significance. According to the Park Service's Southeast Region's Cultural Resources Chief, routine maintenance of historic properties is provided by each park's maintenance staff. He noted, however, that preservation training in the region has been very limited and the parks' maintenance staffs have received little or no preservation training. The Park Service's Southeast Regional Historian said that the only recent preservation training in the region took place in 1985, when 22 of about 250 maintenance personnel were instructed on the proper cleaning and preservation of bronze monuments. He also noted that in recent years, a total of only about four southeast regional officials per year have attended preservation-related training sponsored by the Park Service's national training centers because of the centers' limited number of participant accommodations.

In April 1986, in response to a questionnaire from the Subcommittee on Public Lands, House Committee on Interior and Insular Affairs, the Park Service Director stated that

"Increased training for Federal agency preservation staffs, SHPOs, and others is clearly needed and NPS [the Park Service] would like to provide it, but the need is great and is unlikely to be met simply through shifting NPS priorities alone."

He also noted that it may be necessary for the Park Service to pursue other training approaches, such as joint efforts with other agencies.

Need for a Section 101(h) Training Program

All six of the agencies' designated historic preservation officers appear qualified for their positions on the basis of their educational backgrounds and/or preservation-related experience. For example, all of the preservation officers have college degrees (two bachelors, two masters, and two doctoral) in preservation-related fields; one preservation officer is also a licensed architect; and all six preservation officers have a cumulative total of about 128 years, or an average of about 21 years per person, of preservation-related experience. However, although all six agencies' historic preservation officers believe that their educational backgrounds have adequately prepared them for their preservation positions, we found the following:

- Three of the six agencies' preservation officers desired and could benefit from various updated historic preservation training.
- Four of the six agencies' preservation officers have received little or no historic preservation refresher training.

Historic preservation officials we contacted generally agreed that specific preservation training is very important. For example, construction materials and fabrics often found in historic structures, because of their age, usually require individually tailored maintenance and cleaning treatment. They noted that as a result of inadequate knowledge of or attention to these needs, historic structures can be severely damaged by improper maintenance and cleaning methods. (See examples in ch. 3.) The Office of Technology Assessment also reported in September 1986 that inadequate training was one of several impediments to the adoption and widespread use of advanced preservation techniques that could assist in the restoration and maintenance of historic properties.[4]

[4]Office of Technology Assessment, Technologies for Prehistoric and Historic Preservation, OTA-E-319 (Washington, D.C.: U.S. Government Printing Office, Sept. 1986).

Agency preservation officers told us that they depend on their agencies' regional historic-preservation-related staff to implement and monitor historic preservation activities, including the actual hands-on maintenance and restoration of historic properties. The preservation officers told us that agency-sponsored historic preservation training for regional staffs is not generally available, but would be beneficial.

During our field visits, many of the agencies' regional historic- preservation-related staff indicated that they were not adequately trained to carry out their preservation responsibilities. We found that agencywide staff preservation training that has been provided was usually very basic, sporadic, and infrequent. For example, BLM's Historic Preservation Officer told us that BLM conducted a week-long preservation training program in April 1987. He noted that the program was the first BLM-sponsored agencywide preservation training offered since 1983. Because their agencies provide little or no preservation-related training, field-preservation-related staffs at five of the six agencies generally rely on external preservation training opportunities such as those provided by the ACHP, SHPOs, universities, and others. The ACHP has, for example, sponsored in cooperation with GSA, historic preservation training for over 2,500 federal agency officials focusing primarily on their section 106 responsibilities.

Consequences of Inadequate Historic Preservation Training

We found that as a result of inadequate historic preservation training, serious damage has been done to government owned or managed, nationally and internationally significant historic properties. For example, in July 1985 the Park Service's Southeast Regional Architecture Conservator informed the region's Associate Regional Director for Operations that the San Juan National Historic Site, Puerto Rico (a 400-year-old Spanish fortification of international significance) had been subjected to "wholesale destruction and removal by the National Park Service . . . of structures relating to the continuing history of the San Juan fortifications." He noted that in 1968, Park Service officials at the site had implemented a routine woodwork stripping and refinishing practice that extended into the 1980s. According to the conservator, as a result of this systematic destruction of finishes throughout the site, not one single historic interior or exterior wood member retains its original finish. In another example provided by the Park Service's Southeast Regional Historian, the park superintendent at President Andrew Johnson's home in Tennessee placed a dehumidifier in the basement of the house in 1983. The dehumidifier was intended to eliminate excess moisture in the basement. However, the dehumidifier drew in moisture from

the outside of the house, which caused extensive damage to the inside wall plaster. According to the conservator, better training regarding the significance of these historic structures and their proper care and maintenance could have prevented these and other similar problems.

Establishment of an Awards Program Is Still Uncertain

Section 110(h) of the amended act requires the Secretary of the Interior to establish an annual special achievements awards program for officers and employees of federal, state, and local governments. Under the program, the Secretary may make monetary awards of up to $1,000 and provide citations for outstanding contributions to the preservation of historic resources. Also, the awards program may include the issuance of annual awards by the President to any citizen of the United States recommended for such award by the Secretary.

Purpose of the Section 110(h) Requirement

According to the House report (No. 96-1457) which accompanied the National Historic Preservation Act Amendments of 1980, an annual awards program would recognize federal, state, and local government officials and employees who make outstanding contributions to historic preservation, but who would otherwise go unrecognized and unappreciated.

Existing Awards Do Not Meet Section 110(h) Requirements

According to the Park Service's Associate Director for Cultural Resources, the Park Service's Deputy Director indicated in 1981 that the awards requirements of section 110(h) had been achieved through various existing private and public awards programs. The Secretary's 20th anniversary report, for example, cited 11 existing awards of the Interior Department, Park Service, other organizations, and agency employees as meeting the requirements of section 110(h). These awards, their sponsors, awardees, purposes, and frequency are listed in appendix III.

We found that none of the awards cited in the Secretary's 20th anniversary report meet the requirements of section 110(h) for one or more of the following reasons:

- The award is not specifically for federal, state, and local government officials.
- The award is not specifically for historic preservation activities.
- The award is not presented annually.

For example, our review of Interior and Park Service award recipients from January 1985 to August 1987 shows that Interior's Conservation Service Award and Public Service Award had not been given to either a federal, state, or local government official. The Park Service's Honorary Park Ranger Award and Special Commendation Award were each given only once to a federal official; the Special Commendation Award was given only once to a state official. We also found that the Appleman-Judd Award is given only to Park Service regional employees and is incorrectly cited in the Secretary's report as a Park Service award. The Appleman-Judd Award was established and is funded by Park Service employees. It is not an official Park Service award but is merely endorsed by the Park Service. The Charles E. Peterson Prize is given to students of architecture only.

Two Additional Awards Have Been Established

Two historic preservation awards programs, cosponsored by the ACHP, the Interior Secretary, and the White House under the auspices of the Secretary's "Take Pride in America" campaign[5] were established in August 1987. These awards programs include the President's Historic Preservation Awards and the National Historic Preservation Awards. According to an Interior official, the presentation of these awards is planned for mid-summer 1988 and both of these awards programs will be reevaluated after the fiscal year 1988 awards are made to determine if they should be continued, altered, or discontinued.

The President's Historic Preservation Awards are intended to be presented to private citizens responsible for projects or programs that exemplify the contributions of free enterprise to historic preservation. The President's Awards will recognize a select number of private citizens whose achievements exemplify the contributions of free enterprise to historic preservation. The National Historic Preservation Awards are intended to recognize projects or programs in which there has been federal involvement which could include federal, state, and local government officials. Since it is not known whether the President's and National Awards will be made permanent, it remains to be seen if these awards will meet the requirements of section 110(h).

[5]"Take Pride in America" is a national public awareness program initiated by the Department of the Interior to encourage the public to protect and use the natural, historic, and recreational resources of public lands.

An Awards Program Could Provide Benefits

Of the agencies we reviewed, most headquarters and regional historic-preservation-related officials agreed that a governmentwide historic preservation awards program has merit as both an employee morale builder and a means of increasing awareness within their agencies of the importance of historic preservation activities and objectives.

Conclusions

The Congress made the Secretary of the Interior responsible for implementing a variety of governmentwide historic-preservation-related activities under the amended act. The purpose of these activities was to provide federal agencies with the support and guidance needed to establish and maintain an active national historic preservation program. The Park Service, which was delegated the Secretary's historic preservation responsibilities, has not implemented all of the Secretary's requirements under the amended act. For example, a training program for federal agencies' preservation-related staff has not been adequately established. As a result, federal agencies have not had available the full guidance and support in establishing and maintaining their historic preservation programs intended by the Congress.

We are encouraged that the Park Service has issued the section 110 implementation guidelines for federal agencies and has cosponsored two new historic preservation awards programs, although it remains to be seen whether either will satisfy the awards criteria of section 110(h). The Park Service, however, needs to aggressively pursue the implementation of its historic preservation training responsibilities. Although the Congress did not generally specify completion dates for the implementation of the Secretary's responsibilities, including the requirement to establish a historic preservation training program, it appears that further delays will contribute to the continued damage and loss of significant historic preservation resources. Therefore, we believe that the Park Service should make reasonable efforts to comply with the requirements of the amended act without further delay.

Recommendation

The Secretary of the Interior should direct the Park Service Director to

- Develop and provide as, part of its fiscal year 1990 budget request, a proposal to the Congress detailing how the Secretary (Park Service) intends to adequately provide training opportunities as contemplated by section 101(h) of the 1966 act, as amended. The proposal should include implementation time frames and other pertinent information.

Agency Comments and Our Evaluation

The Interior Department, in addition to providing technical comments, said that the Park Service is committed to providing the meetings, workshops, and courses in historic preservation for the states, federal agencies, and others; but the extent to which it is able to carry out its commitment is limited by dollars and personnel resources. Interior said that the Park Service's training opportunities listed in the report are not complete. In our discussion of the Park Service's preservation training activities, we noted that the training opportunities listed were provided as examples of a wide variety of Park Service historic-preservation-related training. Interior also said that agencies need to take advantage of training opportunities in preservation techniques wherever they occur. The Park Service will consider the possibility of serving as a clearinghouse for available preservation training for the federal agencies, according to Interior. Interior agreed to consider the training issue while preparing the Park Service's 1990 budget, as recommended.

Limited Progress Made by Federal Agencies in Implementing Historic Preservation Requirements

The federal agencies have had limited success in implementing their preservation program requirements. In reviewing the progress made by six federal agencies, we found that efforts to (1) use their historic properties have not been maximized, (2) locate, inventory, and nominate their historic properties have been inconsistent, and (3) protect, preserve, and maintain their historic properties have been inadequate. As stated earlier, historic properties must be at least 50 years old, unless they have achieved significance of exceptional importance within the past 50 years.

In part, the limited progress made by the federal agencies can be traced to the lack of implementing guidelines and training courses discussed in chapter 2. In addition, the agencies may be reluctant to request specific funds to sustain a viable historic preservation program because of budget constraints.

Use of Historic Properties Not Maximized

Section 110(a)(1) requires each federal agency to assume responsibility for the preservation of its historic properties. Agencies are directed to use, to the maximum extent feasible, their historic properties before acquiring, constructing, or leasing other buildings. For the most part, agencies have not established viable programs to feasibly maximize the use of their historic buildings, and in many instances, agencies are not giving serious consideration to the use of their historic buildings.

Agencies Have Not Developed Programs to Maximize Use of Historic Properties

Although the six federal agencies have acknowledged their responsibility for preserving their historic properties, we found that four of these agencies have not established viable programs to maximize the use of their historic property inventories. BLM, the Forest Service, the Postal Service, and VA have not developed specific requirements to use historic structures in preference to new or nonhistoric ones. Postal Service officials pointed out that although their agency does not have a specific requirement for the preferred use of historic properties, the agency does consider using an historic property before constructing or leasing a nonhistoric property. However, many historic properties are not compatible with modern mail-handling techniques which require a structure suitable for light industry use, according to the Postal Service's Office of Real Estate Director. He also noted that the expansion and/or renovation of historic properties can be difficult because of potential or actual adverse effects on surrounding historic properties. Other agency officials generally did not have a specific reason as to why preference requirements had not been established within their agencies' programs.

On the other hand, GSA and the Park Service have developed agencywide management guidelines which require their regional offices to feasibly maximize the use of historic properties. For example, GSA leasing procedures uniformly require that preference be given to all historic properties suitable for office space or other commercial use. All leasing requirements for new space or relocations must be compared with the historic property's cost to determine whether the requirements can be satisfied on a cost-effective basis. The Park Service has also developed detailed historic preservation guidance which details the requirements for utilizing historic properties.

Agencies May Not Be Giving Adequate Consideration to Using Historic Properties

Those agencies that have regulations regarding the preferred use of historic properties may not be giving adequate consideration to their use. For example, GSA and Park Service regional historic-preservation-related officials told us that their agencies are not giving serious consideration to the use of historic properties. GSA's Region 3 historic preservation official stated that there has been a deemphasis in the utilization of historic properties in recent years. She said that the deemphasis has occurred because historic properties, such as buildings, normally do not conform to GSA's safety standards and often do not provide the necessary modern accommodations (such as office space, lighting, and air conditioning) sought by prospective occupants.

Agencies' Efforts to Locate, Inventory, and Nominate Their Historic Properties Have Been Mixed

Section 110(a)(2) requires in part that each federal agency establish a program to locate, inventory, and nominate all properties under its control that appear to qualify for inclusion in the National Register. Our review disclosed that agencies' efforts to locate and nominate their historic properties vary from agency to agency, and within agencies on a region-to-region basis.

Reasons Commonly Cited for Mixed Performance

Agency officials often attributed mixed performance to the absence of implementing section 110 guidelines and insufficient agency resources (specific funding and personnel). It appears that inconsistent performance can also be attributed to the differences between the principal missions and responsibilities of the three land-managing agencies (namely BLM, the Forest Service, and the Park Service), and that of the three buildings-oriented agencies (including GSA, the Postal Service, and VA).

For example, BLM and GSA appear to have a dissimilar historic preservation program focus. One reason, noted by agency officials, is the different types of historic properties in their inventories. BLM has historic and prehistoric resources that are frequently located below ground (viz., archeological sites), whereas GSA's historic properties are more often located above ground (viz., structures). Because of the specific preservation needs of these historic/prehistoric resources, the agencies must tailor their programs to provide the proper preservation methods of protection and care.

Survey Practices

It appears to be a common practice among the six federal agencies, as a first priority, to survey lands for historic resources that are being or will be affected by agency undertakings. As a second priority, and as funds become available, lands planned for future undertakings are surveyed. For the land-managing agencies with large land holdings, the cost of meeting these two priorities leaves little or no funding available for surveying those lands which are not expected to be affected by federal undertakings.

Performance with respect to survey responsibilities also varies within particular agencies on a region-to-region basis. For example, according to Park Service regional officials, the Mid-Atlantic Region has surveyed about 100 percent of its lands for historic properties. In contrast, the Western Region has surveyed an estimated 57 percent of its lands for historic properties. The Park Service's Historic Preservation Officer told us that some of the regions, such as the Mid-Atlantic Region, have surveyed a greater percentage of their properties because, among other reasons, regional management placed a higher priority on that particular aspect of program compliance than did some of the other regions which may have emphasized a different aspect.

Nominations of Historic Buildings Have Been Minimal

For the most part, the six federal agencies' nominations of historic properties to the National Register, as required by section 110(a)(2), have been minimal. For example, preservation officials at 21 of the 25 federal agency field offices which we visited that have nomination responsibilities (VA field office nominations are the responsibility of the headquarters office) and eligible historic properties told us that they were not actively nominating or were only providing minimal resources for nominating their historic properties.

Agency officials told us there is no compelling reason for agencies to nominate their historic properties to the National Register. Section 110 does not establish compliance time frames, and agency officials noted that under section 110(a)(2), a property determined to be eligible for inclusion in the National Register is afforded protection equal to those properties already included in the National Register.

Where slow or minimal efforts to nominate historic properties were noted, agency officials often stated that the effort and expenditure needed to prepare and process the nominations could be applied to other activities, including more immediate preservation needs such as surveying and inventorying potentially eligible properties. Furthermore, some agency officials told us that nominating properties to the National Register affords no additional benefits or advantages for the property. The absence of historic property nominations to the National Register, nevertheless, will prevent many historic properties from being included in the National Register, as intended by the Congress, for many years. For example, given the current workload and resource level (funds and employees), the Park Service's Western Region historic preservation official estimates that it will take about 10 years to prepare the nomination forms for properties currently in its inventory that are eligible for the National Register.

Agencies' Efforts to Protect, Preserve, and Maintain Their Historic Properties Have Been Inconsistent

Section 110(a)(2) also states in part that federal agencies are to exercise caution to ensure that historic properties under their control or ownership that appear to qualify for inclusion in the National Register are not allowed to deteriorate significantly. Our review disclosed that agencies' performance with respect to efforts to protect, preserve, and maintain their historic properties have not been satisfactory.

Reasons Commonly Cited for Inadequate Performance

Agency officials often attributed inadequate performance in protecting, preserving, and maintaining historic properties to (1) the lack of specific historic preservation resources, (2) the use of inappropriate maintenance procedures, and (3) agency officials' insensitivity to historic-preservation-related activities.

Analysis of Agency Efforts to Protect and Preserve Historic Properties

The six agencies' have identified thousands of historic properties that must be protected and preserved as required by section 110(a)(2). However, agency officials told us that their efforts to protect and preserve their historic properties have been inadequate because of the lack of specific historic preservation resources. For example, as of August 1986, the 6 agencies owned about 50,000 buildings. Of these, about 11,900, or about 24 percent, had been identified as being historically significant. Agency officials agreed that protecting and preserving all of these historic properties could not be accomplished without adequate resources specifically earmarked for carrying out their section 110 duties. However, headquarters and regional agency officials indicated that their historic preservation programs have consistently received a low funding priority within their respective agencies. As a result, the agencies' regional officials told us that many historic structures, including buildings, monuments, Indian ruins, and other historic properties, have deteriorated significantly because the agencies could not adequately protect and preserve them. They provided numerous examples of serious deterioration and damage to significant historic properties, including some of national importance, as the result of the lack of specific preservation funds.[1]

The following examples highlight occurrences of serious deterioration and damage because specific historic preservation resources were not available to protect and preserve agencies' historic properties.

The Tallac National Historic Site, Lake Tahoe, California

The Tallac National Historic Site includes the Pope, Baldwin, and Heller Estates, which were constructed between 1884 and 1930 as luxurious summer homes for wealthy San Francisco Bay area families. Located on the southern shore of Lake Tahoe, they represent an important phase in the development of the Lake Tahoe basin as a tourist resort. The Forest Service purchased the estates between 1965 and 1975. The structures exemplify a style of architecture that was popular at Lake Tahoe early in this century. The buildings are constructed of wood and stone, and many are sided with shingles or bark slabs. The interior of the Pope main house is of particularly high-quality workmanship and materials. The three estates have been listed on the National Register in recognition of their historic and architectural values.

[1] As discussed earlier in this chapter, inadequate resources also have a negative impact on an agency's efforts to locate, inventory, and nominate their historic properties.

In 1980, the Forest Service decided to use the site as a cultural center, as well as an administrative complex. Administratively, some of the buildings are used for storage, and as offices, barracks, and a fire station. Culturally, there is a museum in the Baldwin main house and a summertime art exhibit in one of the log cabins. The Pope Estate is slowly being restored to its 1920s appearance, and the main house on the Heller Estate is rented for community events, with the proceeds being used to further the rehabilitation efforts. A proposal was being developed at the time of our review to turn the Heller boathouse into a community theater. Most rehabilitative work has been done through inexpensive or volunteer labor from the Nevada Air National Guard, the local garden club, the Older American program, court referrals, two local associations, student interns, some paid seasonal employees, and many individual volunteers. However, the buildings are still in need of much repair and protection from intruders, vandals, and fire. For example, funds are needed to install a fire prevention sprinkler system; heating and plumbing systems; and other engineering improvements for the Pope, Baldwin, and Heller Estates, according to the regional historic preservation official.

Figure 3.1: Tallac National Historic Site, Lake Tahoe, California

Main house and outlying buildings of the Pope Estate.
Source: Forest Service.

Whiskey Creek Trestle Historic Site, Rio Blanco County, Colorado

The Whiskey Creek Trestle was built in 1906 and then abandoned around 1938. It is listed on the National Register and located on BLM property. The historic structure is in poor condition and in danger of falling into Whiskey Creek because the base supports holding up the trestle are eroding. BLM estimated in 1978 that it would cost about $50,000 to stabilize the trestle. However, because funding was lacking, the work was not done. The Whiskey Creek Trestle continued to deteriorate from a lack of maintenance and stabilization work, and one of its supports has fallen into the creek. BLM estimated in 1987 that it would now cost $300,000 to stabilize the Whiskey Creek Trestle. Because BLM funds are not available to reconstruct and stabilize the trestle (which has now become a safety hazard), as an alternative to demolition, the trestle is scheduled to be dismantled and moved to the Museum of Western Colorado in Grand Junction to be used as an exhibit.

Lowry Pueblo Ruins Historic Site, Pleasant View, Colorado

The Lowry Pueblo was constructed around 1090 A.D. and abandoned by the Anasazi Indians around 1140 A.D. The Pueblo contains one of the largest Kivas (ceremonial chambers) ever found. A Kiva which contains wall paintings is one of the unique features of the Lowry Pueblo.

During 1986 and 1987, the plaster and foundation deteriorated. BLM's state historic preservation official told us that BLM has no funds for major stabilization and protection needed at the site. He believes it should receive priority funding since the ruins are the only historic landmark located on BLM's property in Colorado. He noted that additional damage to the Kiva's painted mural had occurred during an attempt to preserve it. Using a technique suggested by the Park Service of backfilling and plastic to preserve the paint from moisture, the opposite effect occurred. A water build-up behind the walls of the painted Kiva caused the plaster and the mural to crack and fall off. The state historic preservation official told us that funds needed to stabilize this BLM historic site have not been requested because of BLM budget constraints and the low BLM priority given to historic preservation does not make such a request feasible.

Inappropriate Maintenance of Historic Properties

Agency officials provided the following examples of how inappropriate agency maintenance programs and actions by agency officials have caused severe damage to the integrity of historic properties. According to regional preservation-related officials, the lack of agency officials'

Figure 3.2: Whiskey Creek Trestle Historic Site, Rio Blanco County, Colorado

Note that the center support is missing and the deck has a bend.
Source: BLM.

Figure 3.3: Lowry Pueblo Ruins Historic Site, Pleasant View, Colorado

Partial view of ruins today.
Source: BLM.

Figure 3.4: Walls of the Lowry Pueblo Ruins Are Deteriorating

Source: BLM.

awareness and sensitivity to historic preservation maintenance procedures and responsibilities has resulted in some instances of severe damage to nationally and internationally significant historic properties.

San Juan National Historic Site, San Juan, Puerto Rico

San Cristobal, a 400-year-old Spanish fort, is located at the San Juan National Historic Site, which is administered by the Park Service. The fort has national and international historic significance. According to the Park Service's Southeast Region (which has oversight of the San Juan site) Acting Historic Architect, the north wall of the fort suffered severe damage in 1986. He told us that the damage was caused because the site superintendent used a high-pressure water method of cleaning the fort's exterior walls. The proper cleaning method would have been to use an atomizer mist and brush process normally used to clean such surfaces without damaging the stucco type exterior. According to the acting historic architect, the site superintendent was advised of the proper cleaning methods to protect the historic fabric of the fort. However, the superintendent apparently used the water blast method because it was faster, according to the regional historic architect. As a result, the historic north wall exterior finish was partially, and in some places, totally removed.

According to the acting historic architect, the site superintendent has ignored other regional directives and advice regarding the proper methods of maintenance of historic structures at the fort. The region is in the process of documenting 14 incidents of damage or loss, including the one discussed above, as a result of the superintendent's failure to adhere to proper methods of historic property maintenance and repair at the site.

Allegheny National Forest, Warren, Pennsylvania

The Allegheny National Forest, located in northwestern Pennsylvania, encompasses about 743,000 acres of land administered by the Forest Service. In 1986, the former forest supervisor authorized the destruction, by bulldozing and burning, of an historic barn and silo located in the national forest that were constructed in the 1840s. According to Forest Service records regarding this incident, the former forest supervisor cited public safety reasons as the justification for his action. However, according to the Forest Service's Eastern Region Archeologist, the former forest supervisor was not sensitive to the historic importance of the structures, did not prepare the documentation package as required by section 110(b) that would have preserved a written record of the structures, and did not obtain proper Forest Service approvals to demolish the structures. The regional archeologist told us that the former supervisor's actions showed his lack of concern with established procedures in such matters.

Conclusions

As discussed in chapter 2, agencies' limited progress in implementing their historic preservation duties and responsibilities can be traced, in part, to the fact that the Interior Secretary had not issued implementing guidelines or established adequate training programs for the agencies to use. Although the Secretary of the Interior is responsible for implementing some of the duties and responsibilities required by the National Historic Preservation Act of 1966, as amended, most of the act's requirements apply uniformly to all federal agencies. To achieve compliance with the act's requirements, federal agencies must establish and operate intensive preservation programs for historic resource management. These programs, as previously discussed, must include systems for the identification, inventorying, nomination, maintenance, and use of historic properties. To carry out effective and efficient programs, agencies must also provide a variety of support and administrative services.

Federal agency performance with respect to these responsibilities varies on both an agency-to-agency basis and within particular agencies on a region-to-region basis. Agencies' mixed performance reflects a range of both internal and external agency factors, including the absence of governmentwide historic preservation implementation guidelines from the Interior Secretary, conflicting agency missions and priorities, and the lack of specific historic preservation funding. However, even if the external factors remain unchanged, federal agencies can still improve the implementation of the historic preservation program by (1) establishing agency procedures, where absent, that require the use of historic properties in preference to nonhistoric properties and ensuring that agency officials adequately consider the use of their historic properties, (2) establishing agencywide policies and time frames regarding efforts to locate, inventory, and nominate their historic properties, and (3) emphasizing through agency directives that historic properties must be adequately protected, preserved, and maintained.

Recommendations

We recommend that the Secretaries of Agriculture and the Interior, the Administrators of General Services and the Veterans Administration, and the Postmaster General

- ensure that the use of agency owned or managed historic properties is given preference to nonhistoric properties;
- establish agencywide time frames regarding efforts to locate, inventory, and nominate their historic properties; and
- emphasize through agency directives that historic properties must be adequately protected, preserved, and maintained.

Agency Comments and Our Evaluation

Forest Service

Agriculture's Forest Service generally agreed with our findings and recommendations. The Forest Service identified several intended actions in response to our recommendations, including (1) the preparation within the next 12 months of a policy concerning the use and reuse of historic buildings for administrative purposes, for visitor use, and for education and commercial use under lease or permit, (2) working with the Congress in developing budgets and programs to locate, inventory, and evaluate the historic properties of the National Forest System, (3) developing directions and guidelines over the next year for evaluation of administrative and mission support structures and implementation of a program to survey lands, (4) developing and increasing its historic preservation training and educational efforts to increase both management and public awareness of the importance of historic resources, (5) emphasizing, through several ongoing projects, the importance of historic properties, (6) Forest Service manual revisions, and (7) the implementation of previous GAO recommendations regarding the protection and preservation of historic properties.

Interior/Park Service

Interior noted that while the Park Service is a land-holding agency, equal attention is given to both archeological and historic sites, structures, and objects. Interior also said that it would be incorrect for us to agree (with some agency officials) that "inclusion of historic properties in the National Register does not appear to afford significant additional benefits . . . ." It was pointed out that listing a property inventory has significant advantage to any systematic broad-scale planning efforts. We agreed and revised our report accordingly.

The Park Service said that it is in the lead and is setting the example for other agencies in seeking opportunities for reuse or adapting historic properties for reuse in response to our recommendation to ensure that the use of agency owned or managed historic properties are given preference to nonhistoric properties.

The Park Service also said that our assessment of the implementation of the National Historic Preservation Program was not completely accurate, and suggested some technical changes. Where appropriate, they have been incorporated in our report.

GSA

GSA said that the identification of historic properties by federal agencies is significant because it allows for the consideration of historic properties in an agency's planning and development processes and is a necessity for efficient management. GSA noted, however, that the number of properties listed on the National Register is not a significant cultural resource management issue because historic resources can be evaluated and protected more efficiently and effectively through a determination of eligibility process. We recognized that several of the agencies' historic preservation officials questioned whether listing historic properties on the National Register was worth the resource expense. However, the Interior/Park Service comments to our report noted that the listing of a property in a comprehensive nationwide inventory has significant advantages to any entity undertaking systematic broadscale planning efforts and that rational planning efforts cannot be undertaken if eligible resources are identified only at the point of crisis.

According to GSA, determining that a property is historic does not necessarily mean that the property should be preserved or used for federal purposes; it only means that its value should be considered. We found that although agencies are directed to maximize the use of their historic properties, some agencies may not be giving serious consideration to the use of their historic properties in many instances.

GSA agreed with our assessment that the Park Service's historic preservation training program usually leaves little or no opportunity for other federal agency participation.

GSA also said that Interior and the Park Service should be commended for their accomplishments in implementing several historic preservation program activities, including the creation of a comprehensive national management program and issuance of the section 110 guidelines.

Postal Service

The Postal Service said that it has already taken action along the lines that our report recommends. The agency pointed out that since virtually all of its buildings, historic and nonhistoric, are in use, there is no question of giving historic properties preference for use.

All postal facilities over 50 years of age have been identified, according to the Postal Service. It has also created a computerized listing of these properties. In summary, the Postal Service said that its approach is fully responsive to the intent of the National Historic Preservation Act. We disagree with the Postal Service contention that it has implemented the actions recommended in our report. For example, we believe that it is doubtful that compliance with the preferred use of historic property provision of the amended act can be assured by the Postal Service in the absence of specific implementing regulations or other agency requirements for that purpose. Also, although the Postal Service has identified all of its historic properties, it is nominating these properties on a "thematic" basis which groups historic properties by architectural or other theme. The most significant examples of these properties are then selected for nomination to the National Register. However, the amended act states that each federal agency shall nominate all of its properties that appear to qualify for inclusion on the National Register.

VA

VA agreed with our findings and concurred, in part, with the recommendations. VA said that it will develop a policy for the preferred use of historic properties, but that budget constraints must be considered as part of the policy. VA also agreed to establish time frames to complete survey and identification of, and National Register nominations for, VA owned or controlled historic properties. However, the agency noted that because of other priorities' demands for scarce resources, specific time frames may not prove realistic.

Also, VA said it will publish directives to emphasize that historic properties must be adequately protected, preserved, and maintained to the extent that budget constraints will allow. VA suggested some technical changes and, where appropriate, they have been incorporated in our report.

ACHP

ACHP said that the conclusions of our report are consistent with its own observations, and concurred with most of the report's recommendations. The agency noted several technical flaws and made suggested changes. Where appropriate, they have been incorporated in the report. ACHP said that while the intent of our report was to analyze agency performance under section 110, not section 106 of the 1966 amended act, analyzing such performance as if section 106 did not exist does not convey an accurate picture of agency performance. We recognized in the report that the scope of the review was primarily limited to agency compliance

with section 110. The absence of a section 106 assessment does not diminish the accuracy of the information presented.

ACHP also said that its own historic preservation training program, which has trained over 2,500 federal officials in their historic preservation responsibilities, should be mentioned in our report. We noted this information in the report as suggested. ACHP questioned the wisdom of our recommendation to establish agency time frames for efforts to locate, inventory, and nominate historic properties. It recognized that while it would be useful in many cases to establish time frames within which efforts to identify historic properties would be initiated, and to ensure that such efforts moved forward, they will either be ignored or misconstrued to vitiate agency identification responsibilities once the deadlines are passed. Eight years after the 1980 amendments to the 1966 act were passed, we found that agency compliance with the amended act's requirements could still be improved. We believe that establishing agency compliance time frames will create greater agency awareness and responsiveness to those requirements.

ACHP said that agencies can manage their historic properties quite adequately without nominating them to the National Register and suggested that instead of recommending that the agencies give greater attention to a congressional directive that serves little purpose, we should recommend to the Congress that the nomination requirement of section 110(a)(2) be reconsidered. Although some controversy exists among the agencies regarding the requirement to nominate historic properties to the National Register, available information does not support a recommendation to the Congress that the requirement be reconsidered as suggested.

Additionally, ACHP suggested that we recommend that all federal agencies distribute the section 110 guidelines widely to their regional and field offices, and to nonfederal parties that work with them. ACHP also suggested that our recommendation that agencies emphasize protection, preservation, and maintenance should be directed to all federal agencies. Our review was limited to six federal agencies; therefore, the recommendations cannot be expanded governmentwide as suggested.

National Trust

The National Trust agreed with our report's findings and recommendations. It said that (1) federal agencies have made only limited progress in complying with section 110, (2) training of federal historic preservation officers and of agency staff in regional and district offices remains

seriously inadequate, and (3) agencies are failing to comply with the National Historic Preservation Act's mandate to be sensitive to historic resources within their control and those affected by agencies decisions. Also, the National Trust suggested three technical corrections to the report that were incorporated as appropriate.

In addition, the National Trust said that a vigorous training program will be essential to enhancing the federal government's historic preservation efforts. However, without congressional commitment and commitment on the part of all federal agencies to assume their share of responsibility for preserving the nation's heritage, the national historic preservation program will not function as the Congress intended in 1966.

The National Trust noted that the effectiveness of the recently issued section 110 guidelines remains to be seen and suggested that an evaluation be conducted in a year or so to determine federal agency compliance with the guidelines. We will consider this suggestion during our fiscal year 1989 work-planning process.

Section 110 Of the National Historic Preservation Act of 1966, as Amended

Federal agencies' responsibility to preserve and use historic buildings	(a)(1) The heads of all federal agencies shall assume responsibility for the preservation of historic properties which are owned or controlled by such agency. Prior to acquiring, constructing, or leasing buildings for purposes of carrying out agency responsibilities, each federal agency shall use, to the maximum extent feasible, historic properties available to the agency. Each agency shall undertake, consistent with the preservation of such properties and the mission of the agency and the professional standards established pursuant to section 101(f), any preservation, as may be necessary to carry out this section.
Protection and nomination to the National Register of federal properties	(2) With the advice of the Secretary and in cooperation with the State Historic Preservation Officer for the state involved, each federal agency shall establish a program to locate, inventory, and nominate to the Secretary all properties under the agency's ownership or control by the agency that appear to qualify for inclusion on the National Register in accordance with the regulations promulgated under section 101(a)(2)(A). Each federal agency shall exercise caution to assure that any such property that might qualify for inclusion is not inadvertently transferred, sold, demolished, substantially altered, or allowed to deteriorate significantly.
Recordation of historic properties prior to demolition	(b) Each federal agency shall initiate measures to assure that where, as a result of federal action or assistance carried out by such agency, an historic property is to be substantially altered or demolished, timely steps are taken to make or have made appropriate records, and that such records then be deposited, in accordance with section 101(a), in the Library of Congress or with such other appropriate agency as may be designated by the Secretary, for future use and reference.
Designation of federal agency preservation officers	(c) The head of each federal agency shall, unless exempted under section 214, designate a qualified official to be known as the agency's "preservation officer" who shall be responsible for coordinating that agency's activities under this act. Each preservation officer may, in order to be considered qualified, satisfactorily complete an appropriate training program established by the Secretary under section 101(g).
Conduct of agency programs consistent with act	(d) Consistent with the agency's mission and mandates, all federal agencies shall carry out agency programs and projects (including those under which any federal assistance is provided or any federal license, permit, or other approval is required) in accordance with the purposes of this act, and give consideration to programs and projects which will further the purpose of this act.
Transfer of surplus federal historic properties	(e) The Secretary shall review and approve the plans of transferees of surplus federally owned historic properties not later than 90 days after his receipt of such plans to ensure that the prehistorical, historical, architectural, or culturally significant values will be preserved or enhanced.
Federal undertaking affecting national historic landmarks	(f) Prior to the approval of any federal undertakings which may directly and adversely affect any national historic landmark, the head of the responsible federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark, and shall afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking.

(continued)

Preservation activities as an eligible project cost	(g) Each federal agency may include the costs of preservation activities of such agency under this act as eligible project costs in all undertakings of such agency or assisted by such agency. The eligible project costs may also include amounts paid by a federal agency to any state to be used in carrying out such preservation responsibilities of the federal agency under this act, and reasonable costs may be charged to federal licensees and permittees as a condition to the issuance of such license or permit.
Preservation awards program	(h) The Secretary shall establish an annual preservation awards program under which he may make monetary awards in amounts not to exceed $1,000 and provide citations for special achievement to officers and employees of federal, state, and certified local governments in recognition of their outstanding contributions to the preservation of historic resources. Such program may include the issuance of annual awards by the President of the United States to any citizen of the United States recommended for such award by the Secretary.
Applicability of National Environmental Policy Act	(i) Nothing in this act shall be construed to require the preparation of an environmental impact statement where such a statement would not otherwise be required under the National Environmental Policy Act of 1969, and nothing in this act shall be construed to provide any exemption from any requirement respecting the preparation of such a statement under such act.
	(j) The Secretary shall promulgate regulations under which the requirements of this section may be waived in whole or in part in the event of a major natural disaster or an imminent threat to the national security.

List of 25 Federal and 6 SHPOs Locations GAO Selected for Review

Federal Agency Offices	
BLM state offices: Alexandria, Va. Denver, Colo. Sacramento, Calif. Salt Lake City, Utah	Park Service regional offices: Atlanta, Ga. Denver, Colo. Philadelphia, Pa. San Francisco, Calif.
BLM district office: Ukiah, Calif.	Postal Service regional offices: Memphis, Tenn. Philadelphia, Pa. San Bruno, Calif.
BLM resource area office: Folsom, Calif.	VA field sites: Fort Howard, Md. Perry Point, Md. Aspinwall, Pa. Coatesville, Pa.
Forest Service regional offices: Atlanta, Ga. Denver, Colo. Milwaukee, Wis. San Francisco, Calif.	
GSA regional offices: Atlanta, Ga. Ft. Worth, Tex. Philadelphia, Pa. San Francisco, Calif.	

Location of SHPOs	Number of state listings on the National Register
California—Sacramento	1,470
Georgia—Atlanta	1,195
New York—Albany	2,225
Pennsylvania—Harrisburg	1,866
Texas—Austin	1,402
Utah—Salt Lake City	884

Existing Awards of the Interior Department, Park Service, and Other Organizations

Conservation Service Award	Sponsor(s) - Interior Department. Awardee(s) - Individuals or groups. Criteria - Given for direct service toward the effectiveness of the Interior Department's mission; not specifically for historic preservation activities. Frequency - Award presented annually.
Public Service Award	Sponsor(s) - Interior Department. Awardee(s) - Individuals or groups. Criteria - Given for indirect service toward the effectiveness of the Interior Department's mission; not specifically for historic preservation activities. Frequency - Award presented annually.
Honorary Park Ranger Award	Sponsor(s) - Park Service. Awardee(s) - Individuals or groups. Criteria - Given for contributions made in a substantial and distinguished manner to such Park Service activities as (1) the establishment and development of national parks over many years, (2) direct assistance to the Park Service through investigative programs and ideas which actively contribute to mission accomplishment, (3) donations of talent and/or resources which perpetuate the national and cultural heritage of the nation, and (4) other contributions of major significance which further the Park Service's efforts in carrying out its mission. Frequency - Award presented on an on-going basis.
Special Commendation Award	Sponsor(s) - Park Service. Awardee(s) - Individuals or groups. Criteria - Given for substantial effort in support of Park Service goals and objectives. Contributions may include (1) improving visitor services and interpretive programs on a voluntary basis, (2) furtherance of the goals and objectives of the Park Service's printed or broadcast media (examples may include a journalist, artist, or private citizen who has published articles or photos, or developed broadcasts which have been of tremendous value to the Park Service in carrying out its projected objectives), (3) a significant group effort on behalf of conservation and environmental control (examples may include civic organizations or community groups which have been engaged in activities such as cleaning up a stream or raising funds in support of park activities), and (4) cooperation in the use of facilities, equipment, and manpower at the

	time of urgent need and emergencies. Frequency - Award presented on an on-going basis.
Roy E. Appleman - Henry A. Judd Award	Sponsor(s) - Employees of the Park Service. Awardee(s) - Full-time Park Service field office employees. Criteria - Given for outstanding service in the field of cultural resources management, research interpretation, curation, preservation, or management. Frequency - Award presented annually.
Charles E. Peterson Prize	Sponsor(s) - Park Service, Athenaeum of Philadelphia, and American Institute of Architects Awardee(s) - Students of architecture. Criteria - Student or teams of students of architecture with facility sponsorship are eligible to compete for the prize awarded to the best set of drawings prepared to Historic American Buildings Survey standards and that are donated to the survey by the student(s). Frequency - Award presented annually.
Louise E. Dupont Crowninshield Award	Sponsor(s) - National Trust. Awardee(s) - An individual. Criteria - Given for extraordinary lifetime commitment and achievement in historic preservation whose efforts were either of national importance or served as a model nationwide for other preservation efforts. Frequency - Award presented annually.
National Trust Honor Award	Sponsor(s) - National Trust. Awardee(s) - Individuals or groups. Criteria - Given in recognition of projects that demonstrate outstanding dedication and commitment to excellence in historic preservation, rehabilitation, restoration, and interpretation of architectural and maritime heritage. Frequency - Award presented annually.
John Wesley Powell Award	Sponsor(s) - Society for History in the Federal Government. Awardee(s) - Federal employees and others.

Criteria - To recognize excellence in historical work conducted by federal employees and others who study the federal government. The award for historic preservation may be given for achievement in preservation of records, artifacts, buildings, historical sites, or other historical materials. The award for historical display may be given for a museum exhibit, a historical movie, an audiovisual display, or any other form of visual historical presentation.
Frequency - Awards alternate biennially between the fields of historic preservation and historic display.

Design Achievement Awards and Presidential Awards for Design Excellence

Sponsor(s) - National Endowment for the Arts.
Awardee(s) - Current and former federal employees having professional responsibility for design works. Also, federal contractors, state and local governments, and nonprofit organizations that have completed design works for the federal government.
Criteria - The program recognizes exemplary achievements in graphic design, landscape architecture, interior design, product/industrial design, and urban design and planning. One jury selects the Design achievement Awards recipients and from that group, another jury selects the Presidential Awards for Design Excellence recipients.
Frequency - Awards presented quadrennially. The first awards were presented in 1985. To avoid presenting awards immediately after a Presidential election, the next awards will be presented in 1988.

Comments From the Department of Agriculture

United States Department of Agriculture | Forest Service | Washington Office | 12th & Independence SW, P.O. Box 96090, Washington, DC 20090-6090

Caring for the Land and Serving People

Reply To: 1420

Date: FEB 26 1988

Mr. J. Dexter Peach
Assistant Comptroller General
Resources, Community, and Economic
Development Division
U.S. General Accounting Office
Washington, DC 20548

Dear Mr. Peach:

The following comments are to the draft General Accounting Office (GAO) Report, "CULTURAL RESOURCES: Implementation of Federal Historic Preservation Program Can be Improved."

General Comments

Preference for Use of Historic Buildings -- Although no specific directions have been issued by the Forest Service to implement a program for maximizing the use of historic buildings, we follow both GSA and the Department of Agriculture directions to give preference to offers for historic buildings when we acquire leased space.

Field units are currently developing Facilities Master Plans which identify the need or lack of need for existing facilities. Identification of historic values will occur as these plans are completed. Maintenance levels are also determined by this planning process. Due to the potential effect on historic properties, the development of a Facilities Master Plan is considered an undertaking subject to the section 106 process of the National Historic Preservation Act (NHPA). We expect the purposes of section 111 of NHPA to be integrated into this planning process and that proper consideration of historic buildings for administrative uses and preservation will occur.

Survey Practices -- The Forest Service is required to manage two types of historic properties, those which are owned and maintained for administrative and mission support purposes and others which are located on National Forest System lands and therefore under FS control (abandoned mines, prehistoric Indian structures, abandoned and acquired homesteads, etc.). An inventory of administrative and mission support structures is kept, but a complete evaluation of the historic significance of these properties has not yet been completed. Regions have made varying degrees of progress evaluating these properties. Directions have been drafted and are currently under review that will ensure that all potentially historic structures identified in Facilities Master Plans will be evaluated. Those identified as significant will be nominated for inclusion in the National Register of Historic Places. This will take some time as we have more than 8,000 structures to evaluate.

FS-6200-28a (5/84)

Historic structures, not part of the facilities inventory, have not all been identified since the agency has surveyed only about 10 percent of the 191 million acres under its administration. Where such structures exist in areas proposed for development or for other resource project activities, they are being identified as part of our NHPA section 106 responsibilities. If they exist in areas not scheduled for development, such as wildernesses, they will likely not be identified for many years due to the inability of the agency to stretch its limited funding much beyond the pace of project activities.

Nominations -- The number of properties being evaluated remain at about 20 percent of those being identified each year, but the number determined to be significant that are being nominated to the National Register is increasing annually. From 1966 to 1984 the average number of Forest Service nominations was 22 per year. In 1986 the number was 43. In 1987, 91 properties were listed. This has occurred despite assigning a higher priority to survey and identification of properties related to section 106 responsibilities rather than to nominating sites.

Preservation Resources -- The Forest Service receives no specific funding for historic preservation. Funding for the maintenance of administrative, research, and recreation properties is available in limited amounts. Since funding for inventory and evaluation of historic properties is limited, we have given priority to project survey work and the mitigation of direct impacts from development activities.

A pilot program in FY 1988 has directed $500,000 to special projects where private capital and initiative can be generated to match federal funds. Many of the projects funded include preservation or adaptive use of historic buildings. This is the first time the Forest Service has specifically funded such historic preservation efforts. We plan to increase the amount of funding for this program in FY 1989.

Response to Recommendations

-- Ensure that the use of agency owned or managed historic buildings is given preference to nonhistoric buildings.

It is our intent to continue to prepare direction for the management of administrative and mission support structures that will meet the requirements of the National Historic Preservation Act, both section 106 and section 110. A policy concerning the use and reuse of historic buildings for administrative purposes, for visitor use, and for education and commerical use under lease or permit will be prepared within the next 12 months.

-- Establish agencywide timeframes regarding efforts to locate, inventory, and nominate their historic properties.

The Forest Service will continue to work with the Congress in developing budgets and programs to locate, inventory, and evaluate the historic properties of the National Forest System. Directions and guidelines will be developed over the next year to initiate two major efforts: the evaluation of administrative and mission support structures and the implementation of a program to survey lands not currently threatened by development but suspected to contain important historic properties.

FS-6200-28a (5/84)

Mr. J. Dexter Peach 3

-- Emphasize through agency directives that historic properties must be adequately protected, preserved, and maintained.

The Forest Service will continue to develop and increase its training and educational efforts both to increase the awareness of our managers to the need for protection, preservation and maintenance of historic buildings and to increase the public's awareness of and access to important historic resources on the National Forests. Several projects now underway and others scheduled to begin in the next few months will emphasize the importance of historic properties and improve our management of them. Revised Forest Service Manual direction, implementation of recommendations of the Forest Service Cultural Resources Management Program Review, and implementation of previous GAO recommendations will do much to emphasize protection and preservation of historic properties.

We believe the GAO report has identified important concerns with the preservation of the historic remains of our Nation's heritage. We appreciate the opportunity to have participated in this review and we support the findings and recommendations of the report.

Charles R. Hartgrove

F. DALE ROBERTSON
Chief

FS-6200-28a (5/84)

Comments From the Department of the Interior

Note: GAO comments supplementing those in the report text appear at the end of this appendix.

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

March 31, 1988

Mr. J. Dexter Peach
Assistant Comptroller General
United States General Accounting Office
Washington, D.C. 20548

Dear Mr. Peach:

Enclosed are our responses to the recommendations in the draft GAO report CULTURAL RESOURCES: Implementation of the Federal Historic Preservation Program Can Be Improved (GAO/RCED-88-81). In addition to the enclosed, below are some general comments which should be useful to the authors in preparing the final report.

Now on p. 27.
See comment 1.

Although the National Park Service is a landholding bureau as mentioned on page 37, it is incorrect to characterize it as being primarily concerned with archeological resources. While archeological resources are a major concern, equal attention is given to other historic and prehistoric sites, historic and prehistoric structures and objects.

Now on p. 30.
See comment 2.

It is incorrect to agree on page 39 that "inclusion of historic properties in the National Register does not appear to afford significant additional benefits...." Listing a property in a comprehensive nationwide inventory has significant advantage to any entity undertaking systematic broadscale planning efforts. Listing is not designed solely for the benefit of the nominating bureau and rational planning cannot be undertaken if eligible resources are so identified only at the point of crisis.

Now on pp. 31 to 36.
See comment 3.
Now on p. 31.

The term "national" as used on pages 41-49 indicates a lack of understanding of nationally significant resources. Lines 15 and 16 on page 41 refer to such properties and, presumably, go on to cite them. However, only one is cited, Lowry Ruins, a National Historic Landmark, and hence recognized and designated by the Secretary of the Interior as nationally significant. It is clear from Section 110(f) of the National Historic Preservation Act, as amended, that special care is to be exercised toward the protection of National Historic Landmarks. The Federal Preservation Officer for the Bureau of Land Management is correct in asking for priority consideration for the Lowry Ruins.

Sincerely,

Deputy Assistant Secretary for Fish
and Wildlife and Parks

Enclosure

NATIONAL PARK SERVICE
RESPONSE TO DRAFT AUDIT REPORT

CULTURAL RESOURCES: IMPLEMENTATIOPN OF FEDERAL HISTORIC PRESERVATION PROGRAM CAN BE IMPROVED
AUDIT NO. GAO/RCED-88-81

The following are the comments of the National Park Service on the draft GAO report entitled CULTURAL RESOURCES: Implementation of Federal Historic Preservation Programs Can Be Improved (GAO/RCED-88-81).

Recommendation 1: Ensure that the proposed Section 110 Guidelines are promulgated early in 1988 as scheduled without further delay.

See comment 4.

Response: The National Park Service has published for effect the historic preservation compliance guidelines detailing Federal agencies' responsibilities under Section 110 of the National Historic Preservation Act of 1966, as amended. They were published in final in the Federal Register on February 17, 1988.

See comment 5.

The draft report frequently uses the term "historic structure" as though it were interchangeable with the term "historic property." This is a problem particularly in Chapter 1 which presents a summary of the National Historic Preservation Act and its amendments. A reader unfamiliar with the statute, might be lead to believe that the statute addressed only structures (and not districts, buildings, sites and objects). The Executive Summary section of the draft report (especially "Background") should be more specific on the types of historic properties addressed or not addressed by the draft report.

Now on p. 8.
See comment 6.

On page 9, the second sentence of the second paragraph implies that, during the 1950's and 1960's, Federal agencies considered the effects of their projects on historic properties of national and State value, but not of local value. That was not the case. The National Historic Preservation Act was passed to provide a means of protecting all three.

Now on p. 16.
See comment 7.

On page 20, the reviewers seriously misunderstood the Associate Director, Cultural Resources. The Associate Director may have made references to difficulties in carrying out responsibilities on newly expanded National Park Service lands, but most assuredly did not state that the delay in the preparation of the 110 Guidelines was because the National Park Service was implementing its own agencywide historic preservation program instead. Until 1983, the National Register Programs (responsible for Section 110 Guidelines) and the park cultural resources management programs were under different Associate Directors. The Associate

Director, Cultural Resources told the reviewers that increases in staff and financial resources have not kept up with new responsibilities imposed by a wider range of new statutes including the 1980 Amendments, the Archeological Resources Protection Act, the Moss-Bennett Amendments and the Tax Act. In 1980, we had identified 56 new mandates that all had to be carried out under these circumstances and we set about carrying them out according to priority order. The Tax Act activities grew into a major workload after 1981 and did, indeed, slow the development and issuance of 110 Guidelines. The Associate Director did tell the reviewers of the park related responsibilities of the Service by way of emphasizing the relatedness between the Service's duties within the national parks and the Service's duties to run programs through the States and others, but absolutely not that internal obligations prevented achievement of the external mission. Because "internal" activities are funded from a separate appropriation, the statement would have been completely implausible. It is essential that these misunderstandings be corrected in the final report.

Recommendation 2: Develop and provide, as part of the Park Service's fiscal year 1990 budget request, a proposal to the Congress detailing how the Park Service intends to comply with the training and awards requirements of the amended Act. The proposal should include implementation time frames and other pertinent information.

Now on p. 18
See comment 8

Response: Page 23 of the draft report states that "...an adequate historic preservation training program for other federal, state, and local government officials, and others, as required by Section 101 (h), has not been established." This conclusion seems to be based largely on information the reviewers saw in the report entitled The Secretary of the Interior's 20th Anniversary Report on the National Historic Preservation Act prepared by the National Park Service in response to Section 504 of the amended 1966 Act. The training opportunities provided by the Service which are listed in that report are by no means complete. I would be willing to have my staff meet with the reviewers to discuss the complete range of training that is available to the Federal agencies.

Now on p. 20.

Page 26 of the report states, "Section 101 (h) directs the Secretary of the Interior to make training and information about historic preservation methods, techniques, and administrative procedures available to federal agencies, state and local governments, and the general public." In our view, much is being done. The report authors are invited to visit with our program managers to review the extensive list of publications and technical information designed specifically to teach those with historic preservation responsibilities how to carry out the

functions that are referred to in the amended Act. As recommended, we will consider this issue during preparation of our 1990 budget.

See comment 9.

The draft report implies that the responsibility for assuring that the agencies get the training necessary to carry out agencies' preservation functions rests with the National Park Service. The Service is committed to providing the meetings, workshops and courses in historic preservation for the States, Federal agencies and other entities; but the extent to which we are able to carry out our commitment is limited by dollars and personnel resources. The final report should make it clear that the agencies need to take advantage of training opportunities in preservation techniques whereever they occur. The Service will consider the possibility of serving as a clearinghouse for available preservation training for the Federal agencies.

See comment 10.

Since the interviews were conducted by GAO, the mandated awards program has been implemented in the Presidential Awards Program with the Advisory Council on Historic Preservation.

Recommendation 3: GAO also makes recommendations to the Secretaries of Agriculture and the Interior, the Administrators of General Services and the Veterans Administration, and the Postmaster General regarding the preferred use of historic buildings; and the establishment of agencywide efforts to locate, inventory, nominate, protect, preserve, and maintain their historic properties.

See comment 11.

Response: We believe that the National Park Service is in the lead and is setting the example for other agencies in seeking opportunities for reuse or adapting historic properties for reuse. For example, the Director has instructed his housing task force to meet the Service's housing needs to the degree feasible through the rehabilitation of historic buildings. The Service has an on-going program to identify properties on National Park lands that can be leased for compatible uses with the revenues from such leases being applied toward the upkeep, maintenance and preservation of the historic fabric. The Director has ordered the reuse of the Thompson House at Morristown National Historic Park in New Jersey rather than allowing it to be demolished and replaced with a new structure. The Superintendent of Gateway National Recreation Area has encouraged the National Oceanographic and Atmospheric Administration to rehabilitate buildings at Fort Hancock National Historic Landmark in lieu of their preferred alternative of constructing a new facility for their National Marine Fisheries Laboratory. These are representative of the servicewide policy on the use of historic properties and are not exceptional activities.

The following are GAO's comments on the Interior Department's letter dated March 31, 1988.

GAO Comments

1. We have revised the paragraph to clarify the example of our discussions.

2. We have deleted the words implying our agreement.

3. We have revised the sentence to avoid representing all examples of historic properties having "national" significance.

4. We have made appropriate changes in the report to recognize the promulgation of the section 110 guidelines in early 1988.

5. We have changed "historic structure" to "historic property" as appropriate.

6. Sentence revised to recognize the adverse effects of 1950s and 1960s federal projects on nationally, statewide, and locally significant historic properties.

7. Reference deleted as suggested.

8. ". . . Has not been established" has been revised to ". . . may not be adequate." Also, we have revised the report to make it clear that the list of Park Service training programs is not complete, but is intended to illustrate the variety of training available.

9. The report does not state or intend to suggest that the Park Service has a responsibility to obtain preservation training for federal agency personnel or others. However, it does address the Park Services's responsibilities under sections 101(h) and 110(c) to provide governmentwide preservation training.

10. Our report recognizes the Presidential Awards Program cosponsored by the ACHP, the Interior Secretary, and the White House. However, we found that the subject awards are intended for private citizen recognition and will, therefore, not meet the awards criteria of section 110(h).

11. The report disclosed a number of use, survey, inventory, nomination, protection, preservation, and maintenance practices or methods that have allowed or contributed to serious damage of significant historic

properties in the ownership or control of the six federal agencies, including the Park Service. We recognized that agency compliance with the Preservation program requirements is dependent on both internal and external factors. We believe that all six agencies included in our review can improve their compliance with the requirements of the 1966 act, as amended.

Comments From the General Services Administration

Note: GAO comments supplementing those in the report text appear at the end of this appendix.

General Services Administration
Public Buildings Service
Washington, DC 20405

FEB 18 1988

Dear Mr. Fogel:

This report is in reponse to your memorandum dated February 10, 1988. Listed below is the data that you requested.

I. IMPLEMENTATION OF THE NATIONAL HISTORIC PRESERVATION ACT

Over the past 20 years, Federal agencies have worked in coordination with the Secretary of the Interior and State Governments to develop and implement a National Historic Preservation Program. During this period of time, a proactive national cultural resource management (CRM) program has been implemented. This program is comprehensive and extends from the hands-on activities of private sector preservationists (architects, historians, planners, developers) to local design review committees, commissioners, city councils, local planning staffs (State Historic Preservation Programs), and the Federal Government.

The Department of the Interior (DOI) has created a comprehensive national management system that is supported by defined values, objective decision making processes and technical guidelines. We believe that Interior's accomplishments in this regard have been commendable.

II. SECTION 110 GUIDELINES

See comment 1.

The Secretary of the Interior has published Section 110 Guidelines.

In order to develop useful, practical, and operationally realistic guidelines for Federal CRM programs, it was necessary to model such guidelines on proven management applications dealing with resource identification, evaluation, planning, and treatment. Simply stated, the science of CRM had to be created, used, and adapted to Federal purposes before meaningful guidelines could be written.

When the 1980 amendments to the Historic Preservation Act were written, the methodologies for planning and managing cultural resources on a national scale did not exist. Between 1980 and today, Interior, in coordination with Federal agencies and State Historic Preservation Officers, has developed such methodologies, implemented, tested, refined, evaluated and finally, after much review, published Section 110 Guidelines. Again, this has been a commendable accomplishment.

III. IDENTIFICATION OF HISTORIC PROPERTIES

Historic property identification by Federal agencies is significant inasmuch as it allows for the consideration of historic properties in an agency's planning and development processes. The National Register of Historic Places was conceived as a planning inventory for use on a national basis by Federal agencies and others whose projects or undertakings may effect historic properties. Undertakings that effect historic properties must take those effects into consideration during their planning and development processes.

See comment 2

This process is dependent upon identifying properties, then deciding if those properties meet the criteria for listing on the National Register of Historic Places. The National Park Service (NPS) has developed Federal guidelines, standards and criteria for identifying and evaluating properties to determine if they are eligible for the National Register. In accordance with both National Register and Advisory Council on Historic Preservation regulations, Federal agencies, with the concurrence of State Historic Preservation Officers and following the Secretary of the Interior's Standards, determine properties eligible for the National Register without going through a full NPS process. The determination of eligibility process saves time, relieves the NPS of a significant, if not unmanageable workload, and offers identified properties the same level of protection as listed properties.

From GSA's perspective, the Determination of Eligibility (DOE) process is a necessity for efficient management. This is particularly true if related management issues such as timeliness and project costs are taken into consideration. The DOE evaluation process makes it possible to take into account the large number of properties that Federal agencies often have to deal with.

Again from GSA's perspective, the number of properties listed on the National Register is not a significant cultural resource management issue. Resources can be evaluated and protected more efficiently and effectively through the DOE process. However, the NPS must begin to list DOE's on their computerized National Register data base. Without such listings in the data base, Federal agencies cannot get a comprehensive picture of properties in a given geographic area. This situation

can result in duplicative inventories and the unnecessary expenditure of Federal funds. We have advised the NPS of this problem and understand that it is being taken care of.

IV. TRAINING

The Park Service conducts several high quality technical preservation and cultural resource planning courses at their two service centers. Access to these courses would be of great benefit to other Federal agencies. The Park Service does not, per se, exclude agencies from this training - but the classes are not large and NPS staff get first call, this usually leaves little or no opportunity for other Federal agencies.

See comment 3.

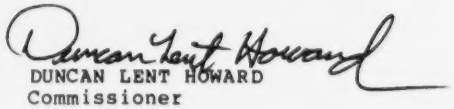
V. USING HISTORIC PROPERTIES

Determining that a property is historic does not mean that the property should be preserved or used for Federal purposes. DOE signifies that a property's value should be considered. Such consideration includes the evaluation of the significance of the property, its material condition, and other management issues such as costs and existing or potential reuse.

The Secretary of the Interior's Section 110 Guidelines address resource evaluation in detail. The National Register Criteria are broad and allow for a mixed range of properties to be considered as eligible. This mix includes properties that are in ruin, properties that are of minimal local significance, and properties that, because of their structural configurations, location, and rehabilitation costs, are not appropriate for continued Government use. The important issue in historic property use is that of evaluation criteria.

GSA utilizes the Secretary of the Interior's Standards and, now, the Section 110 Guidelines in applying such criteria. Historic preservation values have and will continue to have a significant influence on GSA's decision making process.

Sincerely,



DUNCAN LENT HOWARD
Commissioner

Mr. Richard L. Fogel
Assistant Comptroller General
General Accounting Office
Washington, DC 20548

The following are GAO's comments on the General Services Administration letter dated February 18, 1988.

GAO Comments

1. We have made the appropriate changes in the report to recognize the issuance of the section 110 guidelines.

2. The report acknowledges that controversy exists among the six agencies regarding the necessity to nominate historic properties to the National Register as required by the amended act.

3. We disagree with GSA's statement "Determining that a property is historic does not mean that the property should be preserved or used for federal purposes." Section 110(a)(1) specifies that each federal agency shall undertake . . . any preservation as may be necessary to carry out the section 110 requirements. Section 110 requires that federal agencies must not only "consider" the use of their historic properties, but must use them to the maximum extent feasible.

Comments From the U.S. Postal Service

Note: GAO comments supplementing those in the report text appear at the end of this appendix.

THE POSTMASTER GENERAL
Washington, DC 20260-0010

March 10, 1988

Dear Mr. Fogel:

This refers to your draft report entitled CULTURAL RESOURCES: Implementation of Federal Historic Preservation Programs Can be Improved.

The report recommends that several agencies, including the Postal Service, should (1) ensure that the use of agency owned or managed historic buildings is given preference to nonhistoric buildings, (2) establish time frames to locate, inventory and nominate their historic properties, and (3) emphasize the protection, preservation and maintenance of their historic properties.

We have already taken action along the lines the report recommends:

See comment 1

1. About 40 percent of the Service's buildings are at least fifty years old and hence eligible for nomination as historic buildings. Virtually all the Service's buildings, historic and nonhistoric, are in use, so there is no question of preference.

   If more space is needed in an historic building, first consideration is given to modifying the building, rather than acquiring a new one. State Historic Preservation Offices and Advisory Councils are given an opportunity to comment whenever expansion, disposal or acquisition is undertaken.

   If it does become necessary to acquire a building, then the operating needs of the Service for parking, loading dock areas, open interior space, compliance with fire and safety codes, and other factors, both functional and economic, must be considered first. In nearly all cases, such factors

See comment 2.

preclude the use of an historic building, even if one should be available close to the preferred location. However, we judge each case on the merits and do give weight to historical considerations.

2. The Service has already identified and surveyed all postal facilities over fifty years of age and has created a computerized listing of such properties. As mentioned above, there is contact with the appropriate preservation groups regarding actions affecting these properties.

3. We have an active historic preservation program in place, with a Federal Preservation Officer at Headquarters, five field coordinators, regularly scheduled courses and workshops on historic preservation, and participation in the training programs offered by other interested organizations.

We believe our approach is fully responsive to the intent of the National Historic Preservation Act and we thank you for the opportunity to comment on your draft.

Sincerely,

Anthony M. Frank

Mr. Richard L. Fogel
Assistant Comptroller General
United States General
Accounting Office
Washington, D.C. 20548-0001

The following are GAO's comments on the U.S. Postal Service letter dated March 10, 1988.

GAO Comments

1. We have added a discussion of the U.S. Postal Service's modern mail-handling building requirements in chapter 3.

2. Chapter 3 of the report acknowledges that there has been mixed results in federal agency efforts to locate and inventory historic properties. Although the U.S. Postal Service has located and inventoried all of its historic properties, we believe that its efforts to nominate historic properties to the National Register can be improved.

Commments From the Veterans Administration

Note: GAO comments supplementing those in the report text appear at the end of this appendix.

Office of the Administrator
of Veterans Affairs
Washington, D.C. 20420

MAR 10 1988

Mr. Lawrence H. Thompson
Assistant Comptroller General
Human Resources Division
U.S. General Accounting Office
Washington, DC 20548

Dear Mr. Thompson:

This responds to your request that the Veterans Administration (VA) review and comment on the General Accounting Office (GAO) January 28, 1988, draft report CULTURAL RESOURCES: Implementation of Federal Historic Preservation Programs Can Be Improved.

GAO reviewed compliance with historic preservation requirements by the Secretary of the Interior and six federal agencies. GAO makes recommendations to the VA and the other federal agencies regarding the preferred use of historic buildings and the establishment of agencywide efforts to locate, inventory, nominate, protect, preserve, and maintain their historic properties. We agree with GAO's findings and concur, in part, with the recommendations. The enclosure contains our comments on the recommendations made to the VA as well as general comments on the report text.

Sincerely,

THOMAS K. TURNAGE
Administrator

Enclosure

"America is #1—Thanks to our Veterans"

Enclosure

VETERANS ADMINISTRATION COMMENTS ON THE JANUARY 28, 1988
GAO DRAFT REPORT CULTURAL RESOURCES: IMPLEMENTATION OF
FEDERAL HISTORIC PRESERVATION PROGRAMS CAN BE IMPROVED

GAO recommends that the Administrator of the Veterans Affairs ensure that the use of Agency-owned or -managed historic buildings is given preference to nonhistoric buildings.

We concur, in part. The VA does now, to the maximum extent feasible, use or reuse available historic buildings to meet our mission. A policy will be developed to set out this requirement. However, budget constraints must be considered as part of this policy.

GAO also recommends that the Administrator of Veterans Affairs establish agencywide timeframes regarding efforts to locate, inventory, and nominate VA's historic properties.

We concur, in part, with the recommendation. The VA will establish timeframes to complete the survey and identification of, and National Register nominations for, VA-owned or -controlled historic properties. However, because of other priorities' demands for scarce resources, specific timeframes may not prove realistic. Survey and identification priorities are given properties due to be affected by Agency projects or programs. Other properties are surveyed as funds and personnel become available.

GAO also recommends that the Administrator of Veterans Affairs emphasize through Agency directives that historic properties must be adequately protected, preserved, and maintained.

We concur, in part, with this recommendation. We will publish directives to emphasize that historic properties must be adequately protected, preserved, and maintained. As a result, we may be able to eliminate or avoid some improper maintenance and preservation techniques. Because of budget constraints, we may not be able to ensure the adequate protection and preservation of all historic properties.

Comments on Report Text:

Now on p. 9 and p. 27.
See comment 1.

Pages 10 and 35: The draft report gives the impression that a property must be 50 years old to be historic. That is the general rule, but not an absolute. One of the best examples of a building less than 50 years old listed on the National Register is Dulles International Airport.

Now on p. 12.
See comment 2.

Page 15: The draft report suggests that it is the responsibility of individual agencies to request the Secretary of the Interior to approve the plans of transferees (recipients) of federal structures. Except in rare instances, the VA reports unneeded property to the General Services Administration (GSA) as excess to VA's needs. GSA, not the VA, is then responsible for disposal (transfer) of the property.

BEST COPY AVAILABLE

2.

Now on p. 15.
See comment 3.

Page 18: Section 110(e) is paraphrased inaccurately. The language is, "The Secretary (of Interior) shall review and approve the plans of transferees of surplus federally owned historic properties...."

Now on p. 26.
See comment 4.

Page 34: The recommendations to the Secretary of the Interior and the preceeding narrative on training combine agency historic preservation officer training and hands-on crafts person or conservation technician training. For example, we do not believe that an agencywide preservation officer necessarily needs hands-on knowledge and experience in how to clean bronze monuments or replace damaged wood. As an approach for developing training for agency historic preservation officers, we would suggest the following: (1) Identify the minimum knowledges, skills, abilities, or other characteristic needed to do the job; (2) Establish a curriculum to meet the minimums in various ways; (3) Establish "testing out" and "equivalency" procedures; (4) Offer courses and identify alternative courses or sources; and (5) Offer a certificate as evidence that minimums or equivalencies have been met.

The following are GAO's comments on the Veterans Administration letter date March 10, 1988.

GAO Comments

1. We have revised the report to recognize that historic properties must be at least 50 years old, unless they have achieved significance of exceptional importance within the past 50 years.

2. The transfer process of surplus federally owned historic properties was not the subject of our review. Compliance with section 110 (e) requires that the Secretary approve the plans of a transferee to ensure that historical values are preserved.

3. We have made the suggested change.

4. Our recommendation does not propose how the Secretary of the Interior, through the Park Service, can best comply with the section 110 (c) and 101 (h) training requirements. The development of the training program(s) should be, as recommended, the subject of the Secretary's proposal.

Comments From the Advisory Council on Historic Preservation

Note: GAO comments supplementing those in the report text appear at the end of this appendix.

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

FEB 10 1988

Mr. J. Dexter Peach
Assistant Comptroller General
Resources, Community,
and Economic Development Division
General Accounting Office
Washington, DC 20548

Dear Mr. Peach:

Thank you for the opportunity to comment on your proposed report CULTURAL RESOURCES: Implementation Of Federal Historic Preservation Programs Can Be Improved (GAO/RCED-88-81; your code 140717).

In general, the conclusions of the report are consistent with our own observations, and we concur in most of the report's recommendations. I have referred the report to both my General Counsel and to the Director of the Office of Cultural Resource Preservation. We do have a number of comments for your consideration.

The comments enclosed herewith have been prepared by Dr. Thomas F. King. In addition to the comments under three headings: (1) technical flaws, (2) incomplete representation of Advisory Council role, and (3) our comments on the recommendations, we also noted a number of typographical errors in the course of our review which are marked on the enclosed copy.

Again, we wish to thank you for providing us with an opportunity to comment. Should you need any further explanation, please feel free to contact Dr. King at 786-0505.

Sincerely,

Robert D. Bush

Robert D. Busn
Executive Director

Enclosure

REVIEW OF
GAO DRAFT REPORT GAO/RCED-88-81 (Code 140717)
"CULTURAL RESOURCES: IMPLEMENTATION OF FEDERAL HISTORIC
PRESERVATION PROGRAMS CAN BE IMPROVED"

Advisory Council on Historic Preservation
February, 1988

(1) Technical flaws

There are certain consistent flaws in the report that tend to undermine its credibility, although most are of a more or less superficial and technical nature.

Now on p. 8
See comment 1.

(a) At the top of page 9, the report states that the National Historic Preservation Act is "intended to preserve and protect historic structures" (emphasis added). This is incorrect; the Act is explicitly designed to preserve historic properties, defined by Section 301(5) of the Act to include "any prehistoric or historic district, site, building, structure or object included in, or eligible for inclusion on (sic) the National Register..." This error is perpetuated through much of the first part of the report, so confusing matters that on page 15 a battlefield and two National Forests are characterized as "structures."

Now on p. 12.

Now on pp. 28 and 29.
See comment 2.

(b) What may be a related error is expressed at the bottom of pages 37 and 38, where a distinction is made between historic buildings and "cultural resources (archeological sites)." Although archeological sites are certainly different from historic buildings, and while it is true that land-managing agencies tend to be more concerned with the former while building management agencies are more concerned with the latter, a reader who is not fully cognizant of the nuances or historic preservation terminology could conclude from this distinction that archeological sites are not included in the definition of "historic properties" for purposes of Section 110. The potential for confusion is compounded by the report's use of the term "cultural resources" to apply to such properties. This term has no statutory definition but is used by some archeologists in preference to the term "historic properties." We believe it is confusing and recommend that it be expunged. On the one hand it carries with it the implication that "cultural resources" are somehow not historic properties (and vice-versa); on the other, it conveys the notion that only "physical evidence of man's use of the environment..." (cf. p. 71) are cultural resources. In fact, as is made clear in such reports as Cultural Conservation (American Folklife Center and National Park Service 1983), the term properly embraces the intangible aspects of culture as well.

Now on p. 79.

See comment 3.

(c) On page 10, the report says that "agencies' historic preservation duties and responsibilities are set forth primarily in section 110 of the amended act." While this is true, it should be noted that an important responsibility of Federal agencies -- to take the effects of their actions on historic properties into account in planning their undertakings -- is set forth in Section 106 of the Act. In point of fact, it is Section 106 that has motivated most Federal agencies to initiate historic preservation programs, since as you point out, they have been slow to implement Section 110. The report's overall tendency to ignore Section 106 results in a somewhat skewed picture of agency preservation programs.

See comment 4.

(d) On page 38, some confusion and naiveté are indicated when the report says that "agencies which are buildings oriented...have on a national basis surveyed and identified historic properties on nearly all of their total land holdings." It is true that the buildings-oriented agencies reviewed by GAO have identified many if not most of their historic structures, but they have not necessarily identified many of their historic properties, including archeological sites. It should be clearly recognized that agencies are responsible for identifying all kinds of historic properties, not simply those toward which they are "oriented."

See comment 5.

(e) On page 39, the affordance of protection to properties eligible for inclusion in the National Register is attributed to Section 110(a)(2). While Section 110(a)(2) does direct agencies to "exercise caution" with respect to eligible properties, it is Section 106 that primarily motivates agencies to concern themselves with such properties.

See comment 6.

(d) In the Glossary, the definition of "preservation" is inconsistent with Section 301(8) of the Act. "Historic property" is undefined despite its frequent use and statutory definition. As noted above, the definition of "cultural resources" is inappropriately narrow.

See comment 7.

(2) Inaccurate or incomplete representation of Advisory Council role

(a) As noted above, Section 106 of the Act is given rather short shrift throughout the report. While the intent of the report of course is to analyze agency performance under Section 110, not Section 106, analyzing such performance as if Section 106 did not exist does not convey an accurate picture of agency performance.

See comment 8.

(b) On page 11, it should be noted that the Council was established to advise the President, as well as Congress and Federal agencies, on historic preservation matters. It should also be noted that the requirement described in the last sentence on the page (note again the inaccurate use of the word "structure") springs from Section 106, and that the Council's

regulations (36 CFR Part 800), authorized by Section 211 of the Act, direct Federal agencies in carrying out this responsibility.

See comment 9.
Now on p. 23.

(c) In the discussion of the need for training programs under Sections 110(c) and 101(h), we believe that some mention should be made of the Council's training program, carried out in cooperation with the GSA training center, which has trained to date over 2,500 Federal officials in their historic preservation responsibilities. Although Section 106 responsibilities constitute the course's central focus, in recent years we have given increased emphasis to Section 110 as well, in an attempt to fill the gap left by the lack of a specific Section 110(c) training effort. It is important to note this program because we believe it would be a great mistake for Interior to undertake Section 110(c) and Section 101(h) training without coordination with the Advisory Council's program.

See comment 10.
Now on p. 24.

(d) On page 32, it should be noted that the President's Historic Preservation Awards and the National Historic Preservation Awards constitute a program jointly sponsored by Interior and the Council; development of this program was a Council initiative.

See comment 11.
Now on p. 24.

(3) Comments on recommendations

(a) We strongly agree with the recommendation on page 34 that the Section 110 guidelines be promulgated without further delay. We have been working with Interior on these guidelines, and understand that they will in fact be issued momentarily. We suggest that GAO also recommend to the heads of all Federal agencies that they distribute the guidelines widely to their regional and field offices, and to non-federal parties that work with them. It should be recommended further that they be closely adhered to in the development and implementation of agency programs and related activities.

See comment 12.
Now on p. 36.

(b) We agree with the recommendation regarding training on page 34, but request that GAO recommend to the Secretary that Section 110(c) and Section 101(h) training be closely coordinated with the Council's existing training program, to ensure consistency and avoid confusion among those trained.

See comment 11.
Now on p. 36.

(c) We strongly agree with the first recommendation on page 51, that agencies ensure that the use of historic buildings be given preference. We suggest that GAO extend this recommendation to the heads of all Federal agencies. GAO should also remind agencies, however, that their use of historic buildings (and other historic properties) should be designed to preserve their historical, architectural, archeological, and cultural values, and be coordinated with the Council under Sections 106 and 111 of the Act.

See comment 13.

(d) We question the wisdom of the second recommendation on page 51, regarding agency timeframes for efforts to locate, inventory, and nominate historic properties. While it would be useful in

many cases to establish timeframes within which efforts to identify historic properties would be initiated, and to ensure that such efforts moved forward on a reasonable schedule, it should be recognized that identification will take a very long time, and that even completed inventories should be reviewed and updated from time to time in view of changes in the theory and technology of identification. Hard-and-fast time limits for completing inventories, like that established by Executive Order 11593, will either be ignored or misconstrued to vitiate agency identification responsibilities once the deadlines are passed.

Now on p. 29

Furthermore, we agree with the comment you make on page 39, that "the inclusion of properties on the National Register does not appear to afford any significant additional benefits or advantages...." Agencies can manage their historic properties quite adequately without nominating them to the Register; if this is true, then why should they spend the (often considerable) time and money necessary to nominate them? Rather than recommend that the agencies give greater attention to a Congressional directive that serves little purpose, we suggest that GAO recommend to the Congress that the nomination requirement of Section 110(a)(2) be reconsidered.

Now on p. 36.
See comment 11.

(e) We agree with the last recommendation on page 51, that agencies emphasize protection, preservation, and maintenance. As with the first recommendation, we believe that this one should be directed to all Federal agencies, and should include reference to the need to consult with the Council in establishing and implementing the recommended agency directives.

The following are GAO's comments on the Advisory Council on Historic Preservation's letter dated February 10, 1988.

GAO Comments

1. We have revised the report's references from "structures" to "properties."

2. We have revised the report's references from "cultural" to "historic."

3. The report acknowledges that its scope was the implementation, primarily, of section 110 requirements. We have added a footnote reference to section 106 at the bottom of p. 10.

4. The section of the report referred to in this comment was deleted.

5. Both sections 106 and 110 of the 1966 act placed historic preservation requirements directly on federal agencies. We believe that both of these sections motivate agencies to concern themselves with their historic properties.

6. The terms "preservation" and "historic property" have been redefined using the terminology references of the Advisory Council and the National Park Service.

7. We have acknowledged the report's focus in chapter 1. Although the report does not specifically address federal agencies' performance regarding their section 106 responsibilities that require the agencies to (1) consider the effects of their undertakings on historic properties and (2) afford the Advisory Council an opportunity to comment on such undertakings, we reject the contention that, as a result, the report "does not convey an accurate picture" of those section 110 activities discussed in the report.

8. We have added an acknowledgement that the Advisory Council was established, in part, to advise the President as well as the Congress and federal agencies. We also added a footnote reference on p. 10 regarding section 106 requirements.

9. We have added recognition of the Advisory Council's historic preservation training program on p. 29.

10. The report acknowledges the Advisory Council as a joint sponsor of the President's and National Historic Preservation Awards Programs.

11. Our review was limited to six federal agencies; therefore, we are unable to expand our recommendation as suggested. Additionally, section 110(a)(1) directs all federal agencies to undertake any preservation, as may be necessary to carry out the requirements of that section, consistent with the professional standards pursuant to section 101(f). Adding the suggested recommendation would be redundant.

12. We have no basis to make this suggested recommendation; however, we agree that it would be prudent for the Secretary to require coordination with the Advisory Council, the National Trust, and other principal providers of historic preservation training in the development of its section 110(c) and 101(h) training programs.

13. We believe that the agencies have a duty and responsibility to make a reasonable effort to implement the historic preservation requirements of the 1966 act, as amended. Establishing agency time frames to carry out these requirements will, we believe, create greater agency awareness of these duties.

Comments From the National Trust for Historic Preservation

Note: GAO comments supplementing those in the report text appear at the end of this appendix.

National Trust for Historic Preservation

March 25, 1988

J. Dexter Peach
Assistant Comptroller General
U.S. General Accounting Office
Resources, Community, and
Economic Development Division
Washington, DC 20548

RE: Implementation of Federal Historic Preservation Programs Can Be Improved (GAO/RCED-88-81), Proposed Report

Dear Mr. Peach:

Thank you for seeking the comments of the National Trust for Historic Preservation on the proposed report, referenced above. As the Congressionally-chartered organization responsible for promoting public participation in historic preservation and as a partner in the national historic preservation program, the National Trust agrees with the General Accounting Office's (GAO) findings and recommendations.

The National Historic Preservation Act (NHPA) makes historic preservation a responsibility of all federal agencies. This report makes clear that, in many cases, they are not meeting this mandate. The agencies themselves must assume a greater responsibility for directing resources to the accomplishment of the NHPA's goals. In addition, we urge the Congress to exercise its oversight power, as in the valuable report at hand, to better ensure agency compliance.

See comment 1.

The National Trust agrees with the finding that federal agencies have made only limited progress in complying with Section 110 of the National Historic Preservation Act. As the report notes, the adequacy of compliance differs between agencies and between regional offices within the same agency. We agree, too, that this is due in part to the Secretary of the Interior's failure to implement guidelines and adequate training to instruct agencies in historic preservation. Eight years after being so directed, the Secretary, through the National Park Service (NPS), published the Section 110 guidelines on February 17, 1988. How effective the guidelines are in improving federal agency treatment of historic resources remains to be seen. The National Trust recommends that GAO follow up its current report with an evaluation a year or so

1785 Massachusetts Avenue, N.W.
Washington, D.C. 20036
(202) 673-4000

from now of federal agencies' Section 110 compliance record since publication of the guidelines.

Training of federal historic preservation officers and of agency staff in regional and district offices remains seriously inadequate. The National Trust applauds GAO's recommendation that NPS develop as part of its fiscal year 1990 budget request a proposal to provide adequate training opportunities for appropriate personnel throughout the federal government.

The National Trust agrees with the finding that agencies are failing to comply with the NHPA's mandate to be sensitive to historic resources within their control and those affected by agency decisions. Section 110(a)(1) directs federal agencies to "use, to the maximum extent feasible" historic properties in meeting agency needs. This extends to "available" properties not within the agency's own inventory. To those of us frustrated by the sight of unused historic buildings amidst or being replaced by new construction, the lack of agency systems to identify and use historic properties comes as no surprise. Equally, GSA's claim, referenced on page 37, that historic buildings are unsuitable for agency use because of nonconformance to safety standards and lack of modern lighting and air conditioning exemplifies agencies' lack of initiative towards historic buildings. Historic buildings are not unsafe, ill-lit, or too hot by definition, but only because no one has made appropriate modifications. Such modifications are not necessarily any more expensive than the costs associated with new buildings. The point is that agencies do not seriously consider use of historic buildings in addressing their space needs.

Now on p. 27.

The NHPA's thrust and Congressional intent is that federal agencies must incorporate historic preservation as a fundamental part of the achievement of agency mission, rather than treat preservation as a separate and self-contained exercise. Thus, agency officials' statements that they have not received specific program funding for historic preservation (for example, on pages 4, 20, 24, and 40) do not excuse noncompliance with the NHPA. The fact that agencies have not carried out Section 110 and adopted a comprehensive and systematic approach to historic preservation is reflected in the report's specific examples of historic resource destruction. However, we can only guess at the enormous magnitude of loss, including destruction and loss of resources of all physical types, and of the lost opportunities to learn more about our national heritage. The National Trust does not mean to imply, however, that federal agencies are always insensitive to historic properties. Indeed, many exemplary historic preservation efforts occur, for example as a result of the Advisory Council on Historic Preservation consultation

Now on pp. 3, 16, 18, and 29.

process under Section 106 of the NHPA. We believe, however, that federal agencies tend to view historic resources as liabilities rather than opportunites, and projects involving historic resources as exceptions rather than the norm.

We recommend three specific corrections to the report. The entire report, and particularly the introduction, should be corrected to reflect the fact that the NHPA's provisions apply to all historic and prehistoric resources, not just "historic structures." The reference to historic preservation tax provisions on page 20 should note that the Tax Reform Act of 1986 reduced the historic rehabilitation tax credit to 20 percent. Finally, on page 12, the National Trust should be described as a private nonprofit membership organization created by Congressional charter in 1949. Although the statutory citation is correct, we have never seen the Act called "The National Historic Preservation Trust Act of 1949." In furtherance of our charter purposes we function as an advocate on behalf of historic preservation in the private sector through a variety of efforts including our museum properties; educational programs and publications; technical, financial, and legal assistance; Congressional commitment and public policy research.

See comment 2.
Now on p. 16.
Now on p. 10.

In conclusion, a vigorous training program will be essential to enhancing the federal government's historic preservation efforts. However, without Congressional commitment and commitment on the part of all federal agencies to assume their share of responsibility for preserving the nation's heritage, the national historic preservation program will not function as Congress intended in 1966. The National Trust looks forward to a follow-up to the current report that evaluates agencies' responses to GAO's recommendations and to the newly-published Section 110 guidelines.

Sincerely,

David A. Doheny

David A. Doheny
Vice President and General Counsel

The following is GAO's comment on the National Trust for Historic Preservation's letter dated March 25, 1988.

GAO Comment

1. We have made the suggested changes, as appropriate.

2. We will consider the recommendation during our fiscal year 1989 work-planning process.

Major Contributors to This Report

Resources, Community, and Economic Development Division, Washington, D.C.	James Duffus III, Associate Director, (202) 275-7756 Robert E. Allen, Jr., Group Director Peter M. Bramble, Jr., Evaluator-in-Charge Charles R. Chambers, Evaluator Earl P. Williams, Jr., Writer/Editor Tanya L. Goforth, Secretary/Typist
Philadelphia Regional Office Staff	Frederick P. German, Regional Management Representative Ronald D. Leporati, Site Senior Richard A. Chojnicki, Evaluator Jacquelyn T. Clinton, Evaluator William E. Lee, Evaluator

Glossary

Historic Building	A structure created to shelter any form of human activity and which meets the National Register criteria.
Historic Property or Resource	Any prehistoric or historic district, site, building, structure, or object included in or eligible for inclusion in the National Register. Such term includes artifacts, records, and remains which are related to such a district, site, building, structure, or object.
Historic Site	A distinguishable piece of ground or area upon which occurred some important historic event, or which is associated with important historic events or persons, or which was subjected to sustained activity of man—prehistoric, historic, or both—and meets the National Register criteria.
Historic Structure	A work of man, either prehistoric or historic, consciously created to serve some form of human activity and which meets the National Register criteria.
Preservation	The act or process of applying measures to sustain the existing form, integrity, and material of a building or structure and the existing form and vegetative cover of a site. It may include initial stabilization work, where necessary, as well as ongoing maintenance of the historic building materials.
Rehabilitation	The process of returning a structure to a state of efficiency by major repairs or alterations so that it will serve a useful purpose. It provides that portions of the structure (external, internal, or in combination) which are important in illustrating cultural values be preserved or restored.
Restoration	The process of accurately recovering the form and details of a site, structure, or part of a structure, together with its setting, as it appeared at a particular period of time by the removal of later work and the replacement of missing original work. Restoration may be full or partial and may be combined with rehabilitation.

U.S. G.P.O. 1988-201-749:80146

Requests for copies of GAO reports should be sent to:

U.S. General Accounting Office
Post Office Box 6015
Gaithersburg, Maryland 20877

Telephone 202-275-6241

The first five copies of each report are free. Additional copies are $2.00 each.

There is a 25% discount on orders for 100 or more copies mailed to a single address.

Orders must be prepaid by cash or by check or money order made out to the Superintendent of Documents.